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CITY OF SAN DIEGO

COMPREHENSIVE HOUSING AFFORDABILITY STRATEGY (CHAS)

October 1, 1991 - September 30, 1996

MAUREEN O'CONNOR, MAYOR

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San Diego Housing Commission

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U.S. Department of Housing and Urban Development
February 28, 1992

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CITY OF SAN DIEGO

COMPREHENSIVE HOUSING AFFORDABILITY STRATEGY (CHAS)

October 1, 1991 - September 30, 1996

Prepared By

San Diego Housing Commission

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THE CITY OF
SAN DIEGO
AMERICA'S FINEST CITY

MAUREEN O'CONNOR
MAYOR

December 9, 1991

Mr. Charles Ming
Manager
Los Angeles Office
U.S. Department of Housing and Urban Development
1615 W. Olympic Boulevard
Los Angeles, CA 90015-3801

Dear Mr. Ming:

I am pleased to enclose, for your agency's review, eight (8) copies the City of San Diego's Comprehensive Housing Affordability Strategy (CHAS).

The lead agency responsible for this document is the San Diego Housing Commission. Evan Becker is the Executive Director of that agency, and he is reachable at 619-231-9400, should you have any questions regarding the City's CHAS.

This document has been prepared with a great deal of thought and effort, utilizing the instructions made available by the Department of Housing and Urban Development. As the instructions specify, in cases where the City did not have access to 1990 census data, the best available demographic information was used. Some of our sources include the City's 1988 Housing Assistance Plan, 1990 SourcePoint Household Income data from the San Diego Association of Governments (SANDAG), SANDAG's 1988 Affordable Housing Survey, and the City's 1991 proposed Housing Element.

On August 5th, the San Diego Housing Commission authorized a draft CHAS for circulation during a 60-day public comment period extending from August 7th through October 7th. Following the public comment period, revisions were made and a final draft was adopted by the San Diego City Council today.

Again, I am pleased to enclose this document, and please feel free to contact Mr. Becker should you have any questions regarding its content.

Sincerely,

Maureen O'Connor

Maureen O'Connor
Mayor

Enclosures

Comprehensive Housing Affordability Strategy (CHAS)

U.S. Department of Housing
and Urban Development
Office of Community Planning and Development

Name of Jurisdiction(s) or Consortium
CITY OF SAN DIEGO

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Type of Submission (mark one)

	Fiscal Years Covered:
[X] New Five Year CHAS	FY 1992 – FY 1996
[ ] Annual Update	Fiscal Years Covered:

If an Annual Update (mark one)

[ ] Parts 4 (Resources) & 5 Implementation) Only

[ ] Parts 4 & 5, plus minor changes: (mark those which apply)

Part 1 – Needs Assessment	[ ] Narrative	[ ] Tables
Part 2 – Market & Inventory Cons	[ ] Narrative	[ ] Tables
Part 3 – Strategies	[ ] Narrative	[ ] Tables

Jurisdiction	HUD Approval
Name of Authorized Official: EVAN E. BECKER	Name of Authorized Official
Signature & Date: X Evan Becker 1/3/92	Signature & Date: X

form HUD-40090(5/16/9

ACKNOWLEDGEMENTS

The City of San Diego's Federal Fiscal Year (FFY) 1992 - FFY 1996 Comprehensive Housing Affordability Strategy (CHAS) was prepared by the San Diego Housing Commission (SDHC). However, SDHC could not have completed this effort without the cooperation of many individuals and organizations. Among those whose assistance is particularly noteworthy are: the San Diego Association of Governments (SANDAG), the County of San Diego Department of Housing and Community Development, the Regional Task Force on the Homeless, the City of San Diego Planning Department, the City of San Diego Community Services Office, Centre City Development Corporation, and the many concerned citizens who attended the CHAS public forums. Their many contributions are appreciated.

SUMMARY OF THE CHAS DEVELOPMENT PROCESS

The San Diego Housing Commission was the agency responsible for drafting the City's CHAS. Commission staff, within the Program and Policy Development (P&PD) Department, began work on the document in April 1991. P&PD embarked on this effort by first developing a work program which outlined specific tasks that would be undertaken and a time line for accomplishing them. Most tasks centered around eight (8) primary activities:

1. Assembling background information and relevant regulations pertaining to CHAS, HOME, and HOPE;

2. Conducting interviews with government officials, SANDAG staff, non-profit and industry representatives, and Housing Commission staff;

3. Organizing public forums to solicit citizen participation;

4. Coordinating with State officials;

5. Preparing a draft document for public comment;

6. Revising the draft document following public comment;

7. Presenting a new draft for City Council approval; and

8. Submitting a final document to HUD.

Assembling Information

During April and May 1991, staff gathered, assimilated and clarified, where necessary, background and regulatory information on CHAS, HOME and HOPE (Item 1 above). In addition, part of May was used to consult with those who are involved in the planning, funding, development and management of affordable housing and related services (Item 2 above). For instance, meetings were held with SANDAG, the local Council of Governments, which provides demographic data to local jurisdictions in the region and assists them in preparing planning documents, such as the State required Housing Element. In this case, SANDAG was asked to provide technical assistance by drafting Parts I (Needs Assessment) and II (Market and Inventory Conditions) of the CHAS, using the most current population, income, and housing information in its database.

In addition, meetings were held with representatives of the City's Community Services Program. These discussions were used to determine allocation of the City's Community Development Block Grant dollars for housing and related services. A meeting was also held with the Director of the Regional Task Force on the Homeless to obtain up-to-date information on the City's homeless population, their needs, and current or proposed programs to address those needs. Discussions were then held with representatives of the Centre City Development Corporation (CCDC). CCDC has responsibility for implementing the City's downtown redevelopment program, including low-income housing activities that are financed with tax increment dollars. Individual meetings were held with line personnel at the Housing Commission to determine FFY 92 needs and goals for Federal and State housing programs such as Section 8, Public Housing, Housing Rehabilitation Program, California Housing Rehabilitation Program, California Rental Housing Construction Program, Mortgage Credit Certificate Program, State and Federal Low-income Housing Tax Credit Programs, etc. Meetings were also held with the Program Director of the City's recently approved Housing Trust Fund to determine anticipated program allocations during FFY 92. Telephone discussions occurred with Area HUD officials to estimate funding allocations under various supportive housing programs to the City and to non-profits in FFY 92. And, finally, telephone discussions were held with State energy officials to estimate FFY 92 allocations to non-profits under Federal energy conservation programs.

During May 1991, staff also made arrangements for a public forum on the CHAS (Item 3 above). More than 1800 people were invited to attend one of the two sessions of the forum which was held on June 5, 1991. The mailing list included local, state and federal officials, non-profits, for profit developers, community activists and others involved in affordable housing efforts. Fifty-five members of the public attended, and gave input in these areas: (1) needs, (2) policies, and (3) strategy.

The Initial CHAS Draft

After the June 5, 1991 public forum, Housing Commission staff began drafting Parts III (Strategy), IV (Resources), and V (Implementation Plan). In addition, conversations with affordable housing and social service providers were completed. On July 22, 1991, Housing Commission staff attended a meeting in Sacramento held by the State Department of Housing and Community Development, the entity responsible for preparing the State CHAS. At the meeting, the City of San Diego and the other entitled jurisdictions in attendance were informed of the State's time line for completion of its CHAS. Also at the meeting, San Diego shared a preliminary draft of its CHAS with State officials (Item 4 above). By late July 1991, the draft had been finalized, and Housing Commission staff prepared to take it to the Commission on August 5, 1991 for authorization to distribute it for a 60-day public comment period, extending from August 7 to October 7, 1991 (Item 5 above).

Public Comment Period

The August 5, 1991 Housing Commission meeting was duly publicized and several members of the public were in attendance to give testimony. Housing Commission staff subsequently made several revisions to the draft, based on the August 5th testimony, and had the document reprinted for the public comment period. Copies of the reprinted draft were placed in seven (7) public facilities throughout the City for public review during the 60-day comment period.

Later in August 1991, the Housing Commission scheduled a second public forum, on August 21st at 6:00 p.m., to begin soliciting comments on the draft document. Also in August 1991, Housing Commission staff were informed by State officials that, for the FFY 92 CHAS, the City needed only to submit a copy of its document to the State in response to State/Local coordination requirements. On August 28, 1991, Housing Commission staff responded to the State with an up-to-date copy of its draft CHAS and with a time line for completion of the document. September was spent reading written comments which the Housing Commission received, and modifying the draft document as appropriate.

Following the close of the public comment period on October 7, 1991, Housing Commission staff made further revisions to the draft, as appropriate, and prepared to take it to the City Council on October 29, 1991 for consideration. That meeting was duly publicized in accordance with standard City Council procedure. The Housing Commission also publicized the meeting. At the October 29, 1991 meeting, Council requested additional time to review the revised draft; consequently, consideration of the CHAS was postponed until November 12, 1991. On October 31, 1991, the Housing Commission sent a letter to Charles Ming, Manager of the Los Angeles HUD Office, advising HUD of the City's delay in submitting its CHAS.

On November 12, 1991, at least one member of the Council requested another postponement; consequently, consideration of the document was delayed a second time until December 9, 1991. On December 9, 1991, the City Council unanimously adopted the CHAS by a vote of 8 - 0, with one member absent. The City Council resolution approving the CHAS is contained in Addendum 9. HUD's approval letter is included on pages ix to xii.

Preparation and Submittal of the Final Document

Following the City Council meeting, the draft was revised to address comments made at the public session. A final document was submitted to HUD on January 3, 1992. HUD subsequently approved the City's CHAS on February 28, 1992.

U.S. Department of Housing and Urban Development
Los Angeles Office, Region IX
1615 West Olympic Boulevard
Los Angeles, California 90015-3801

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REC'D

CDBG
ADMINIST

Maureen Stapleton, Deputy City Manager
City of San Diego
ATTENTION: Don V. Hansen
202 "C" Street
San Diego, CA 92101

Dear Ms. Stapleton:

SUBJECT: Comprehensive Housing and Affordability Strategy (CHAS)
for Fiscal Year 1992 - Approval Letter
City of San Diego

The Comprehensive Housing Affordability Strategy (CHAS) submitted for your jurisdiction has been reviewed by HUD and approved. We look forward to working with you over the coming year to refine and improve this document as the Final regulations on CHAS submissions and 1990 Census data become available.

Your next submission will be governed by the final CHAS regulations which are expected to be available in April 1992. In the meantime, listed on the attachment are some areas of your CHAS which, although approved for this submission, could be improved. These recommendations are advisory only.

If you have any questions, please contact your Community Planning and Development Representative, at (213) 251-7248 or me, at (213) 251-7122.

Very sincerely yours,

Charles Ming
Manager

Enclosure

ADVISORY COMMENTS ON THE CITY OF SAN DIEGO COMPREHENSIVE HOUSING AFFORDABILITY STRATEGY

Section I Community Profile

Part 1 Needs Assessment

Housing Needs-Five Year Projections

The instructions for preparing a CHAS state that a jurisdiction must consider whether and how its housing needs will change over a five year period. For your next CHAS the City should evaluate whether or not there will be significant changes in the City's estimate of housing needs during the next five years. If applicable, describe the changes and include another Table 1A with projections of the changing needs.

If appropriate, you should also discuss any foreseeable changes in housing needs that may result from those employed or expected to be employed in the City but not currently residing there.

Supportive Housing Needs For Others With Special Needs

Two important groups that you should consider in next year's needs analyses are those persons who will be returning to the community from mental and physical health care institutions and those low income families who could benefit from participating in an organized program to achieve economic independence and self sufficiency.

Part 2 MARKET AND INVENTORY CONDITIONS

Narrative-Housing Condition

In order to plan an effective housing program, we suggest that next year's CHAS fully examine market and inventory conditions to determine how they may affect your housing plan. Indicate what effect market conditions may have on the City's ability to provide rental housing and to promote new ownership opportunities. In addition, the CHAS should describe how current and anticipated conditions may be expected to influence the use of funds made available for rental assistance, production of new units, rehabilitation of existing units, and the acquisition of existing units.

Section II Five Year Strategy

Part 3 Strategies

Priorities for Assigning Investment

Next year's CHAS should provide more detail about how priorities were assigned among the various geographic areas within the City. In addition, indicate to what extent the City considered the housing assistance needs of various racial and ethnic groups in allocating its investment.

Relevant Public Policies.

The CHAS described several City policies which had the effect of reducing the City's ability to provide affordable housing for lower income persons. To counteract these policies, the City is in the process of creating other strategies that would create affordable housing, most notably the Housing Trust Fund. The creation of this fund, however, does not entirely address affordability problems caused by all of the policies which were described. For next year's CHAS we recommend that a strategy be developed or ruled out for each policy creating a barrier to affordable housing. By using this approach the City should be able to specify which policies require remedies and determine whether the remedies being proposed will actually solve the problem.

PROGRAMS, SERVICE AND SPECIAL INITIATIVES STRATEGIES

Supportive Housing and/or Services for Other Persons With Special Needs

Next year's strategy should specifically address the unmet needs of persons with disabilities, (mental, physical and development) the elderly, persons with AIDS, and low income families who could benefit from participation in an organized program to achieve economic independence and self-sufficiency.

Section III ONE YEAR PLAN/ANNUAL UPDATE

Part 4 Resources

Narrative

Next year's CHAS should describe any actions the City will take to influence other entities to apply for and/or make use of funds for affordable and supportive housing programs. The CHAS should also identify whether or not there are any court orders or consent decrees that could affect the provision of assisted housing or fair housing remedies and how these orders might affect the City's goal and resources.

The CHAS action plan should be more program specific. Under each category indicate the projected funds, the number of persons or families to be assisted, and by what timetable.

Part 5 Implementation

This section serves as a one year action plan or strategy.

Affordable Housing Narrative

Next year's CHAS should explain what actions will be taken to assist very low income renters who meet Federal preferences for housing assistance, but still have unmet needs.

Supportive Housing for Other Persons With Special Needs

1. The CHAS should provide more detail and describe goals and specific programs and policy initiatives for homeless families and individuals including those who are mentally ill, alcohol and drug abusers, victims of domestic violence, runaway and abandoned youth. Include in your list of programs a description of the services which will be provided: 1) for those who are able to make the transition to independent living, 2) for those who are incapable of achieving independent living, and 3) for those low income families who could benefit from participation in an organized program to achieve economic independence.

Monitoring Plan

We understand that the City is in the process of developing a more specific monitoring plan. Next year's CHAS should contain a fully developed plan for monitoring CHAS performance. The plan should include the standards and procedures that will be used to ensure that:

1. Programs are being carried out in a timely manner and according to all statutory and regulatory requirements and that

2. Any information being submitted to a HUD's cash and management information system is complete and accurate.

(This document was re-typed for inclusion in the CHAS.)

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COMPREHENSIVE HOUSING AFFORDABILITY STRATEGY (CHAS)

EXECUTIVE SUMMARY

(A Spanish translation of the Executive Summary is included as Addendum 8.)

The National Affordable Housing Act of 1990 (NAHA) has been lauded by its supporters as an indication that the federal government is again ready to assume a leadership role in the provision of affordable housing. Though becoming more active in the affordable housing arena through NAHA, the federal government clearly acknowledges that state and local jurisdictions, as well as non-profit entities and private industry now play an increasingly important role in providing affordable housing throughout the nation. Consistent with this new reality, the federal government has moved toward allowing more flexible use of selected federal housing dollars, and introducing the requirement that specified federal dollars must be matched by local contributions. NAHA seeks to coordinate the many providers of housing with the multiple resources now available for its support by requiring that local jurisdictions utilizing federal housing monies create a Comprehensive Housing Affordability Strategy (CHAS).

The CHAS is comprised of five sections, each of which represents a step in creating a plan to address local affordable housing needs from October 1, 1991 to September 30, 1996. The CHAS begins by documenting the very low-, low-, and moderate-income housing needs of the locality and ends by describing the jurisdiction's implementation plan for the coming year. For purposes of the CHAS, the federal government defines very low-income households as those families whose income does not exceed 50 percent of the median area income. Low-income households are those families whose income does not exceed 80 percent of the median area income, and moderate-income households are those families whose incomes are between 81 and 95 percent of the median area income. Each section of the CHAS is summarized below.

Needs Assessment

Nearly 61,000 of an approximate 100,000 low-income renter households in San Diego would require subsidies to make their monthly rental obligations affordable (30 percent of monthly household income dedicated to housing). Adding the 5,000-7,000 urban homeless (not including homeless agricultural workers and day laborers in non-urbanized areas) and very low- and low-income homeowners overburdened by housing costs results in nearly 75,000 very low- and low-income San Diego households in need of assistance in order to attain affordable housing. Of these, nearly 34,000 low-income households dedicate more than half their monthly income to meeting housing costs. The current need for affordable housing is sizable, yet that need is even

more dramatic when it is realized that an additional 17,520 low-income housing units must be produced in San Diego during the next five years just to meet the City's increased demand. Couple the large proportion of low-income families with the high housing costs in the region, and the resulting mix creates a recipe for extreme hardship. In some cases, the extent of hardship is increased by additional special needs of such groups as the mentally ill, those afflicted with AIDS, and victims of domestic violence. As with most cities, San Diego has relied heavily on federal assistance to provide housing affordable to very low-income families. Federal assistance has been provided through the City and its Housing Authority and, in some cases, directly from the federal government to nonprofits and private developers. Approximately 3,600 affordable rental units in private ownership are now in danger of being removed from the City's affordable housing stock as a result of prepayment by owners of federally subsidized mortgages. This potential loss could severely impact San Diego's efforts to provide additional housing affordable to low-income families.

Market and Inventory Conditions

According to the 1990 Census, the City of San Diego has a population of more than 1,110,000 people. Approximately 59 percent of residents are White, 20.6 percent are Hispanic, 11 percent are Asian and Pacific Islanders, 9 percent are Black, and .4 percent are comprised of Native Americans. The fact that San Diego has, in recent years, ranked among the least affordable cities in the nation has had an impact, directly or indirectly, on all San Diegans.

The City of San Diego is fortunate that most of its housing stock is in sound condition. Despite this good fortune, nearly 25,000 homes are in need of and suitable for rehabilitation. As is the case in many communities, very low-income families often must live in substandard housing because they can only afford to pay the lower rents demanded for these units. Though 25,000 homes in need of rehabilitation may not seem very significant for a city the size of San Diego, it's magnitude can best be appreciated when it is understood that it would take over 30 years to rehabilitate 25,000 homes based on the current annual rate achieved through publicly assisted rehabilitation programs.

Strategies

The City of San Diego will continue to rely on a multi-faceted approach to provide affordable housing for San Diegans. A partnership comprised of the public sector, private sector, and non-profit entities will utilize a combination of resources to finance the new construction, acquisition, and rehabilitation of housing affordable to lower-income families, as well as the provision of rental assistance and support services. This varied approach is well suited to San Diego which has an existing housing stock that is generally in good condition, yet has ample remaining

opportunity for renovation; new housing will also be added to accommodate current unmet needs and future growth.

The City recognizes that the extent to which its affordable housing needs can be addressed is limited by available resources and production capacity. Since all affordable housing needs cannot be met immediately, it is necessary to establish priorities to determine how resources will be allocated among the many in need. The City's first priority is to provide additional, and preserve existing, housing opportunities affordable to very low-income San Diegans through new construction, acquisition, and rehabilitation of rental housing, and through the provision of rental assistance. Second priority activities include the provision of: homeless services, support services for many very low-income households, housing rehabilitation, and homeownership assistance to low-income households. And finally, third priority activities include the provision of: support services for low-income households, rental assistance to low-income households, and homeownership assistance to very low and moderate-income households.

San Diego recognizes that several existing local policies may hinder efforts to provide housing affordable to its residents. Therefore, in addition to bridging the affordability gap through the infusion of public monies, the City is committed to removing affordable housing barriers, and will modify programs, procedures, and policies to do so.

Resources

The CHAS lists all federal, state, and local resources anticipated to be available to support affordable housing activities within the City of San Diego, and all funds which are expected to be committed for that purpose between October 1, 1991 and September 30, 1992. In addition, available dollars are allocated among the following activities: rehabilitation, acquisition, tenant assistance, new construction, home buyer assistance, planning and implementation grants, support services, and operating costs. The City of San Diego's affordable housing plan includes a substantial investment in rehabilitation, acquisition, new construction, and home buyer assistance, along with a smaller investment in additional tenant assistance, the provision of support services, and planning grants. It is anticipated that more than $85 million will be invested to provide additional affordable housing assistance to eligible San Diegans during FFY 92. When additional support to continue existing assistance is included, more than $100 million will be invested to provide decent and affordable housing for San Diegans. An investment of this amount clearly provides more than affordable housing opportunities; it has a ripple effect that benefits this City's overall economy.

Implementation

The City's first assisted housing priority according to its five year plan is to provide housing opportunities affordable to very low-income San Diegans through new construction, acquisition, rental assistance and rehabilitation of rental housing units. Approximately 5000 additional families are expected to receive housing assistance during FFY 92 . Of that number, nearly 4000 families are very low-income. Most assistance is provided to renters (some of whom will also receive related support services), with much lower levels of assistance expected to be available to homeowners and first-time home buyers. Among those in this income group most likely to receive assistance with homeownership are a limited number of mobile homeowners seeking assistance for purchase of their mobile home park. Also, of the 5000 households expected to receive assistance in FFY 92, approximately 1300 will be served through weatherization programs.

The City of San Diego plans to continue the practice of having private non-profit entities provide most housing assistance to homeless individuals and families through the use of emergency shelters, additional emergency beds available during inclement weather, as well as transitional housing and related support services. The City anticipates that, during FFY 92, most homeless services will continue to be available in and near the downtown area.

Housing and related assistance will be provided during the year to a number of persons with AIDS, under-housed and homeless agricultural workers, battered women, the mentally ill, and homeless youth. The extent to which housing assistance is provided to these groups, though influenced by local priorities, will be determined largely by the availability of federal and state support for these activities.

All housing programs supported with federal funds and subject to the CHAS will be monitored on a regular basis to ensure compliance with occupancy and affordability requirements. In addition, certification is provided, showing that the City complies with federal fair housing and relocation requirements.

PART 1. NEEDS ASSESSMENT

Part 1 summarizes available data on the most significant current housing needs of very low-income, other low-income and moderate-income families and projects those needs over the five-year CHAS period. This part also summarizes the most significant current supportive housing needs of homeless persons and other persons with special needs.

A. Housing Assistance Needs

1. Current Estimates

Table 1A on page 6 is entitled "Housing Assistance Needs of Low- and Moderate-income Households." It provides 1990 U. S. Census data updated to October 1, 1991, for the City of San Diego on housing needs of households of very low-income (0 to 50 percent of median-income), other low-income (51 to 80 percent of median-income), moderate-income (81 to 95 percent of median-income), and middle-income (96 to 120 percent of median-income). The data is further broken down by household characteristics (elderly, and small and large family non-elderly) and occupancy (renters and owners). There are 5 additional Table 1As on pages 7 to 11 which highlight income data for five ethnic groups in the City. Information in these tables is derived primarily from the City's 1988-1991 Housing Assistance Plan (HAP). The HAP identifies the percentage of each minority group which falls within the very low- and low-income categories and the percentage of each minority group by family type. These percentages were then applied to the 1990-1991 data noted above to produce Tables 1A on pages 7 to 11.

According to the information in Table 1A, page 6, 38 percent (156,615 households) of the total number of households in the City of San Diego are low-income. Of this total, 81,858 households are very low-income, and 74,757 are other low-income. In addition, there are 32,159 moderate-income households (See Figure 1: Household Income). A significant number of these households are experiencing cost burdens in terms of housing costs.

For example, among low- and moderate-income households combined, 88,890 pay more than 30 percent of their income for housing, and 40,354 pay more than 50 percent of their income for housing (See Figure 2: Low/Mod Income Cost Burden). Of the total low-income households, 34,066 pay more than 50 percent of their income on housing, of which 30,652 or 84 percent are renters.

According to the 1990 Census, 5.9 percent, or 11,545 of the total number of owner-occupied households, are overcrowded, and 14.8 percent, or 30,987 of renter households in the City, are living in overcrowded conditions. When 14.8 percent is applied to low-income renter households, the result is 14,546 households living in overcrowded conditions. Overcrowded is defined as a housing unit containing more than one person per room.

CHAS Table 1A

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

Housing Assistance Needs of Low & Moderate Income Households

Comprehensive Housing Affordability Strategy (CHAS)

Name of Jurisdiction(s) or Consortium:

City of San Diego

Five Year Period:
FY: '92 through FY: '96

Mark One:
[X] Current Estimate as of: (enter date) 01-Oct-91
[ ] Five-Year Projected Estimate as of: (enter date)

Mark One:
[X] All Households
[ ] Racial/Ethnic Group Households: (specify)1

Household by Type, Income, & Housing Problems	Renters: Elderly 1 & 2 Member Households (A)	Renters: Small Related (2 to 4) (B)	Renters: Large Related (5 or more) (C)	Renters: All Other Households (D)	Renters: Total Renters (E)	Owners: Elderly 1 & 2 Member Households (F)	Owners: Small Related (2 to 4) (G)	Owners: Large Related (5 or more) (H)	Owners: All Other Households (I)	Owners: All Owners * (J)
1. **Very Low Income (0 to 50%)**	13,130	23,362	2,079	16,140	54,711	6,515	11,592	1,032	8,008	27,147
2. With Housing Problems	551	981	87	678	2,297	124	220	20	152	516
3. Physical Defects	184	327	29	226	766	13	23	2	16	54
4. Overcrowded	1,851	3,341	297	2,308	7,797	241	429	38	296	1,004
5. Cost Burden > 30%	9,454	13,083	1,164	9,038	32,739	1,433	3,014	268	2,082	6,797
6. Cost Burden > 50%	5,646	6,074	541	4,196	16,457	456	696	62	480	1,694
7. **Other Low-Income (51 to 80%)**	11,326	20,151	1,793	13,923	47,193	6,616	11,770	1,047	8,131	27,564
8. With Housing Problems	476	846	75	585	1,982	126	224	20	154	524
9. Physical Defects	159	282	25	195	661	13	24	2	16	55
10. Overcrowded	1,620	2,882	256	1,991	6,749	245	435	39	301	1,020
11. Cost Burden > 30%	8,155	11,285	1,004	7,797	28,241	1,456	3,060	272	2,114	6,902
12. Cost Burden > 50%	4,870	5,239	466	3,620	14,195	463	706	63	488	1,720
13. **Total Low-Income**	24,456	43,513	3,872	30,063	101,904	13,131	23,362	2,079	16,139	54,711
14. Moderate Income (81 to 95%)	4,310	7,668	682	5,299	17,959	3,408	6,063	540	4,189	14,200
15. With Housing Problems	181	322	29	223	755	65	115	10	80	270
16. Physical Defects	60	107	10	74	251	7	12	1	8	28
17. Overcrowded	616	1,097	98	758	2,569	126	224	20	155	525
18. Cost Burden > 30%	3,103	4,294	382	2,967	10,746	750	1,576	140	1,089	3,555
19. Cost Burden > 50%	1,853	1,994	177	1,378	5,402	239	364	32	251	886
20. **Middle-Income HHs. (96 to 120%)**	5,814	10,343	920	7,146	24,223	6,315	11,235	999	7,762	26,311
21. **All Households**	34,580	61,524	5,474	42,508	144,086	22,854	40,660	3,618	28,090	95,222

1 See Table 2A for listing of Racial/Ethnic Groups.

***Or, if appropriate, based on HUD income limits with required statutory adjustments.**

CHAS Table 1A

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

Housing Assistance Needs of Low & Moderate Income Households

Comprehensive Housing Affordability Strategy (CHAS)

Name of Jurisdiction(s) or Consortium:

City of San Diego

Five Year Period: FY: '92 through FY: '96

Mark One:
[X] Current Estimate as of: (enter date) 01–Oct–91
[ ] Five–Year Projected Estimate as of: (enter date)

Mark One:
[ ] All Households
[X] Racial/Ethnic Group Households: (specify)1 HISPANIC

Household by Type, Income, & Housing Problems	Renters					Owners				
	Elderly 1 & 2 Member Households (A)	Small Related (2 to 4) (B)	Large Related (5 or more) (C)	All Other Households (D)	Total Renters (E)	Elderly 1 & 2 Member Households (F)	Small Related (2 to 4) (G)	Large Related (5 or more) (H)	All Other Households (I)	All Owners * (J)
Very Low Income (0–50%)	4,011	11,363	1,337		16,711					
With Housing Problems										
Physical Defects										
Overcrowded										
Cost Burden > 30 %										
Cost Burden > 50%										
Other Low–Income (51 to 80%)	3,702	10,490	1,234		15,426					
With Housing Problems										
Physical Defects										
Overcrowded										
Cost Burden > 30%										
Cost Burden > 50%										
Total Low–Income										
Moderate Income (81 to 95%)	7,713	21,853	2,571		32,137					
With Housing Problems										
Physical Defects										
Overcrowded										
Cost Burden > 30%										
Cost Burden > 50%										
Middle Income HHs (96 to 120%)										
All Households										

1 See Table 2A for listing of Racial/Ethnic Groups.

***Or, if appropriate, based on HUD income limits with required statutory adjustments.**

CHAS Table 1A

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

Housing Assistance Needs of Low & Moderate Income Households

Comprehensive Housing Affordability Strategy (CHAS)

Name of Jurisdiction(s) or Consortium:

City of San Diego

Five Year Period:
FY: '92 through FY: '96

Mark One:
[X] Current Estimate as of: (enter date) 01-Oct-91
[ ] Five-Year Projected Estimate as of: (enter date)

Mark One:
[ ] All Households
[X] Racial/Ethnic Group Households: (specify)1 ASIAN

Household by Type, Income, & Housing Problems	Renters					Owners				
	Elderly 1 & 2 Member Households (A)	Small Related (2 to 4) (B)	Large Related (5 or more) (C)	All Other Households (D)	Total Renters (E)	Elderly 1 & 2 Member Households (F)	Small Related (2 to 4) (G)	Large Related (5 or more) (H)	All Other Households (I)	All Owners * (J)
Very Low Income (o to 50%)	3,694	10,467	1,231		15,392					
With Housing Problems										
Physical Defects										
Overcrowded										
Cost Burden > 30%										
Cost Burden > 50%										
Other Low-Income (51 to 80%)	3,410	9,661	1,137		14,208					
With Housing Problems										
Physical Defects										
Overcrowded										
Cost Burden > 30%										
Cost Burden > 50%										
Total Low-Income	7,104	20,128	2,386		29,660					
Moderate Income (81 to 95%)										
With Housing Problems										
Physical Defects										
Overcrowded										
Cost Burden > 30%										
Cost Burden > 50%										
Middle-Income HHs (96 to 120%)										
All Households										

1 See Table 2A for listing of Racial/Ethnic Groups.

***Or, if appropriate, based on HUD income limits with required statutory adjustments.**

CHAS Table 1A

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

Housing Assistance Needs of Low & Moderate Income Households

Comprehensive Housing Affordability Strategy (CHAS)

Name of Jurisdiction(s) or Consortium: City of San Diego

Five Year Period: FY: '92 through FY: '96

Mark One:
[X] Current Estimate as of: (enter date) 01-Oct-91
[ ] Five-Year Projected Estimate as of: (enter date)

Mark One:
[ ] All Households
[X] Racial/Ethnic Group Households: (specify)1 BLACK

Household by Type, Income, & Housing Problems	Renters					Owners				
	Elderly 1 & 2 Member Households (A)	Small Related (2 to 4) (B)	Large Related (5 or more) (C)	All Other Households (D)	Total Renters (E)	Elderly 1 & 2 Member Households (F)	Small Related (2 to 4) (G)	Large Related (5 or more) (H)	All Other Households (I)	All Owners * (J)
Very Low Income (o to 50%)	3,800	10,765	1,267		15,832					
With Housing Problems										
Physical Defects										
Overcrowded										
Cost Burden > 30%										
Cost Burden > 50%										
Other Low-Income (51 to 80%)	3,507	9,938	1,169		14,614					
With Housing Problems										
Physical Defects										
Overcrowded										
Cost Burden > 30%										
Cost Burden > 50%										
Total Low-Income	7,307	20,703	2,436		30,446					
Moderate Income (81 to 95%)										
With Housing Problems										
Physical Defects										
Overcrowded										
Cost Burden > 30%										
Cost Burden > 50%										
Middle-Income HHs (96 to 120%)										
All Households										

1 See Table 2A for listing of Racial/Ethnic Groups.

*Or, if appropriate, based on HUD income limits with required statutory adjustments.

CHAS Table 1A

Housing Assistance Needs of Low & Moderate Income Households

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

Comprehensive Housing Affordability Strategy (CHAS)

Name of Jurisdiction(s) or Consortium:

City of San Diego

Five Year Period:
FY: '92 through FY: '96

Mark One:
[X] Current Estimate as of: (enter date) 01-Oct-91
[ ] Five-Year Projected Estimate as of: (enter date)

Mark One:
[ ] All Households
[X] Racial/Ethnic Group Households: (specify)1 NATIVE AMERICAN

Household by Type, Income, & Housing Problems	Renters					Owners				
	Elderly 1 & 2 Member Households (A)	Small Related (2 to 4) (B)	Large Related (5 or more) (C)	All Other Households (D)	Total Renters (E)	Elderly 1 & 2 Member Households (F)	Small Related (2 to 4) (G)	Large Related (5 or more) (H)	All Other Households (I)	All Owners * (J)
Very Low Income (0 to 50%)	317	897	105		1,319					
With Housing Problems										
Physical Defects										
Overcrowded										
Cost Burden > 30%										
Cost Burden > 50%										
Other Low-Income (51 to 80%)	292	828	98		1,218					
With Housing Problems										
Physical Defects										
Overcrowded										
Cost Burden > 30%										
Cost Burden > 50%										
Total Low-Income										
Moderate Income (81 to 95%)	609	1,725	203		2,537					
With Housing Problems										
Physical Defects										
Overcrowded										
Cost Burden > 30%										
Cost Burden > 50%										
Middle-Income HHs (96 to 120%)										
All Households										

1 See Table 2A for listing of Racial/Ethnic Groups.

***Or, if appropriate, based on HUD income limits with required statutory adjustments.**

CHAS Table 1A

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

Housing Assistance Needs of Low & Moderate Income Households

Comprehensive Housing Affordability Strategy (CHAS)

Name of Jurisdiction(s) or Consortium:

City of San Diego

Five Year Period:
FY: '92 through FY: '96

Mark One:
[X] Current Estimate as of: (enter date) 01-Oct-91
[ ] Five-Year Projected Estimate as of: (enter date)

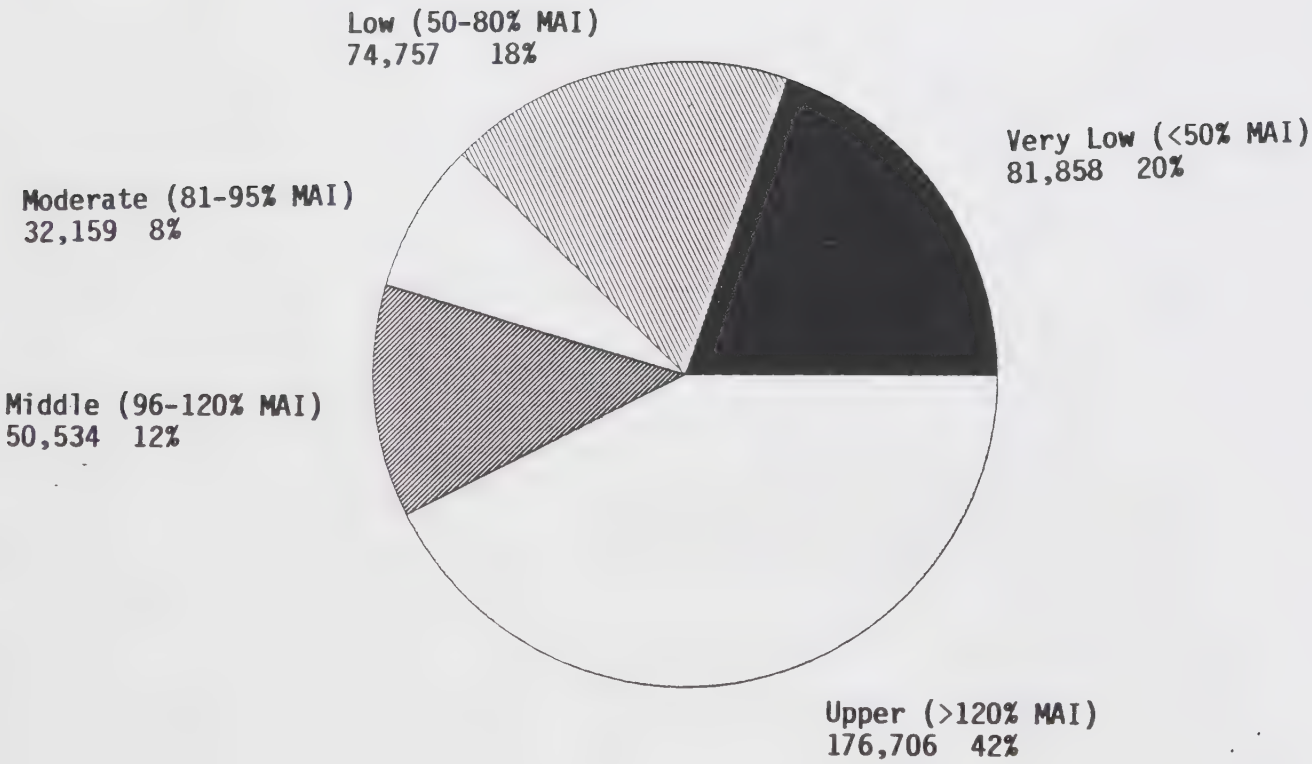
Mark One:
[ ] All Households
[X] Racial/Ethnic Group Households: (specify)1 OTHER

Household by Type, Income, & Housing Problems	Renters					Owners				
	Elderly 1 & 2 Member Households (A)	Small Related (2 to 4) (B)	Large Related (5 or more) (C)	All Other Households (D)	Total Renters (E)	Elderly 1 & 2 Member Households (F)	Small Related (2 to 4) (G)	Large Related (5 or more) (H)	All Other Households (I)	All Owners * (J)
Very Low Income (o to 50%)	2,744	7,775	915		11,434					
With Housing Problems										
Physical Defects										
Overcrowded										
Cost Burden > 30%										
Cost Burden > 50%										
Other Low-Income (51 to 80%)	2,533	7,178	844		10,555					
With Housing Problems										
Physical Defects										
Overcrowded										
Cost Burden > 30%										
Cost Burden > 50%										
Total Low-Income	5,277	14,953	1,759		21,989					
Moderate Income (81 to 95%)										
With Housing Problems										
Physical Defects										
Overcrowded										
Cost Burden > 30%										
Cost Burden > 50%										
Middle-Income HHs (96 to 120%)										
All Households										

1 See Table 2A for listing of Racial/Ethnic Groups.

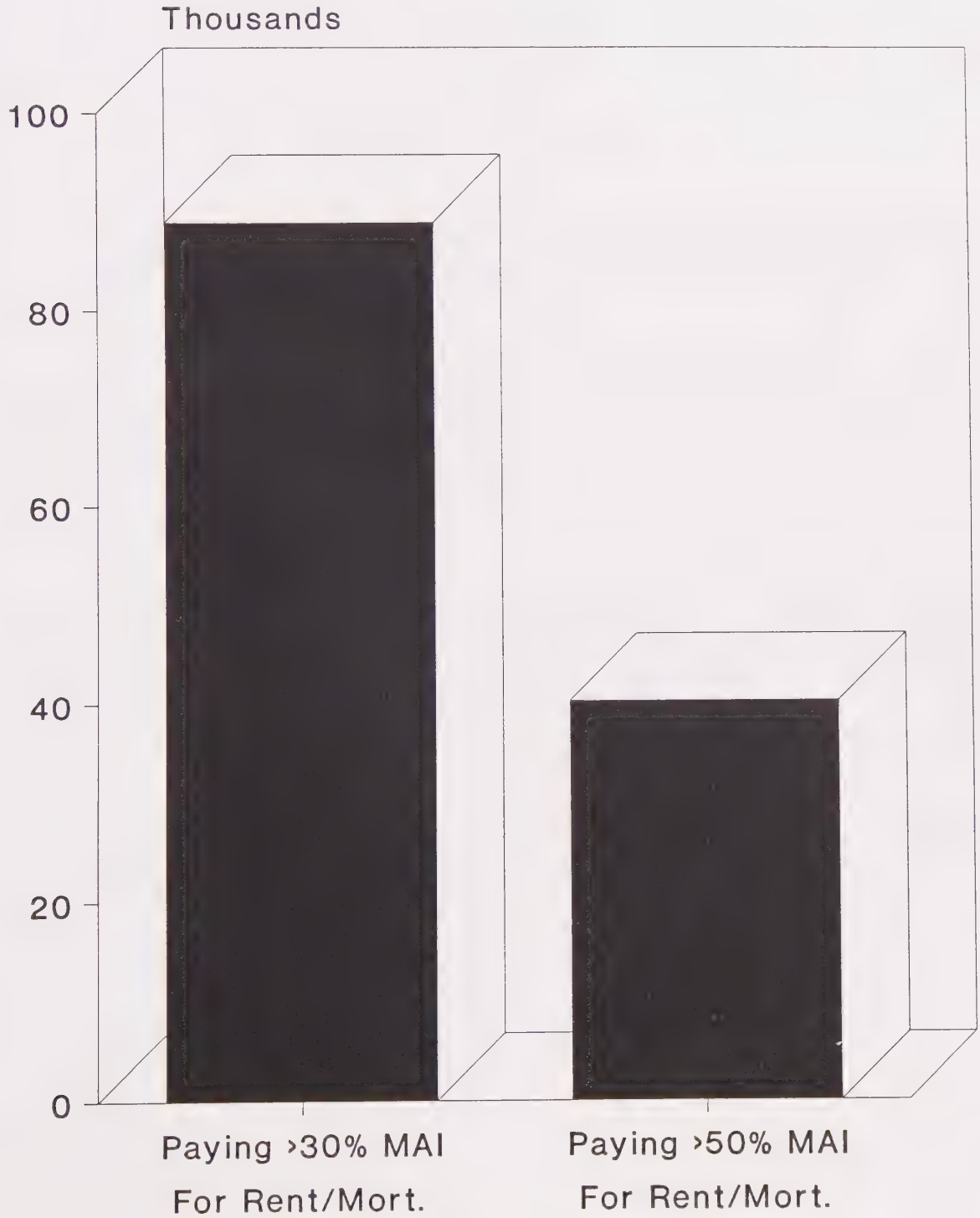
***Or, if appropriate, based on HUD income limits with required statutory adjustments.**

FIGURE 1: HOUSEHOLD INCOME



City of San Diego

FIGURE 2: LOW/MOD INCOME COST BURDEN



City of San Diego

Approximately 25,000 San Diego households meet Federal preferences for priority admission to rental assistance programs; of the approximately 17,000 families on the Housing Commission's waiting list to receive Section 8 rental assistance, nearly 12,000 meet Federal preferences. Preference households include unassisted very low-income renter households who pay more than half of their income for rent, those living in seriously substandard housing (which includes homeless people) or those households that have been involuntarily displaced.

Of the nearly 18,000 households currently receiving housing assistance provided through HUD, nearly 10,000 families live in HUD assisted developments and the remaining households receive tenant-based assistance. In addition, there are 6,099 military units restricted to lower grade enlisted personnel with income limits. The City also has more than 4,500 affordable units assisted through a local density bonus program and through a low-interest first-time home buyer program. The low-interest first-time home buyer program is financed with federal mortgage revenue bonds.

The elderly, and persons with disabilities who do not require supportive services, need, in addition to architectural design features that accommodate their physical disabilities, access to health care, to grocery stores/pharmacies, and an accessible, economical means of transportation. Site planning and design of these facilities should facilitate social interaction and independent living.

2. Five-Year Projections

The City of San Diego is expected to need 17,520 new housing units for low-income households during the next five years as part of its regional share. As defined by State law, regional share identifies the need for new housing units by jurisdiction and distributes that need to all income groups: very low (income not exceeding 50 percent of regional median), other low (income between 50 and 80 percent of regional median), moderate (income between 81 and 120 percent of regional median), and above moderate (income exceeding 120 percent of regional median).

Foreseeable changes in housing needs that may result from those employed or expected to be employed in the City, but not currently residing here, are incorporated into SANDAG's regional share calculation. With those changes, the City's total regional share for the time frame of this CHAS would be 43,802 housing units.

B. Supportive Housing Needs of Homeless Persons

1. Current Estimates

Table 1B, "Homeless Population--Totals", provides the 1990 U.S. Census data on the homeless in the City of San Diego. It shows a total count of 4,947 homeless persons. Most agree that this figure under-represents the actual number of homeless San Diegans. City staff estimate the number of urban homeless to be in the range of 5,000-7,000 people, not including homeless agricultural workers and day laborers living in the non-urbanized areas of the City.

The San Diego Regional Task Force on the Homeless estimated in 1989 that there were approximately 19,600 homeless persons in San Diego County. This number includes two groups: (1) 5,600 urban homeless, of which 1,600 sleep in emergency shelters, and (2) 12,000 to 14,000 farm workers and day laborers, who live primarily in the hillsides, canyons and fields of the North County and the central, eastern and southern parts of the County.

The Regional Task Force on the Homeless estimates that families account for approximately 33 percent of the homeless population in the region. Although the exact number of homeless families is unavailable, the estimate of 33 percent would result in 1,731 persons in families in the City of San Diego. These families tend to be resident homeless families or transient, intact families headed by a single parent, usually the mother.

The homeless youth population includes both runaway and throwaway youth. Homeless youth account for approximately 25 percent, or approximately 1,237, of the total homeless population in the City of San Diego. Many of these homeless youth, 19 to 20 percent of the 25 percent, are within the family units described above. The balance (5 to 6 percent of the 25 percent) are teenagers on their own.

Adults account for approximately 75 percent, or 3,710, of the urban homeless. This homeless category includes families and single adults. The majority of single adults are young males seeking employment. Approximately 40 percent of urban single-homeless men are veterans, 25 percent of the single adults are female, and 5 percent are elderly.

The Task Force estimates 33 percent of the single-homeless-adult population suffer from severe and persistent mental illness. Evidence indicates that up to 50 percent of the County's homeless adult population may be active substance abusers. Data is currently unavailable regarding racial/ethnic status of homeless, special needs by family type, and special needs by shelters/unsheltered status, as noted in Table 1C, Special Needs.

The rural homeless are generally farm workers and other business day laborers, many of whom became legal residents after the passage of the Immigration Reform and Control Act of 1986 (IRCA). The majority of these are males living alone, although families are beginning to join

CHAS Tables 1B & 1C

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

Homeless Population

Comprehensive Housing Affordability Strategy (CHAS)

Name of Jurisdiction(s) or Consortium:

CITY OF SAN DIEGO

Mark one:
[X] All Homeless
[ ] Racial/Ethnic Group (Specify)

Five Year Period: (enter fiscal yrs.)
FY: 92 through FY: 96

Table 1B
Totals

Category	Total (A)	Sheltered (B)	Unsheltered (C)
1. Number of Families with Children	UNAVAILABLE		
2. Number of Persons in families with Children	1,731	1,004	727
3. Number of Individuals not in Families with Children	3,216	1,865	1,351
4. Total Persons/Individuals (Lines 2+3)	4,947	2,869	2,078

Table 1C
Special Needs

UNAVAILABLE

Category	Number of Families with Children*		Number of Individuals	
	Sheltered (A)	Unsheltered (B)	Sheltered (C)	Unsheltered (D)
1. Mentally Ill				
2. Drug Abuse				
3. Alcohol Abuse				
4. Victims of Domestic Violence				
5. Runaway/Abandoned Youth				
6. Other (specify)				

* Include families with head of household or spouse having the characteristics listed.

form HUD-40090 (6/14/91)

CHAS Tables 1B & 1C

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

Homeless Population

Comprehensive Housing Affordability Strategy (CHAS)

Name of Jurisdiction(s) or Consortium:

CITY OF SAN DIEGO HISPANIC

Mark one:
[ ] All Homeless
[X] Racial/Ethnic Group (Specify)

Five Year Period: (enter fiscal yrs.)
FY: 92 through FY 96

Table 1B

UNAVAILABLE

Totals

Category	Total (A)	Sheltered (B)	Unsheltered (C)
1. Number of Families with Children			
2. Number of Persons in families with Children			
3. Number of Individuals not in Families with Children			
4. Total Persons/Individuals (Lines 2+3)			

Table 1C
Special Needs

UNAVAILABLE

Category	Number of Families with Children*		Number of Individuals	
	Sheltered (A)	Unsheltered (B)	Sheltered (C)	Unsheltered (D)
1. Mentally Ill				
2. Drug Abuse				
3. Alcohol Abuse				
4. Victims of Domestic Violence				
5. Runaway/Abandoned Youth				
6. Other (specify)				

* Include families with head of household or spouse having the characteristics listed.

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CHAS Tables 1B & 1C

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

Homeless Population

Comprehensive Housing Affordability Strategy (CHAS)

Name of Jurisdiction(s) or Consortium:

CITY OF SAN DIEGO ASIAN

Mark one:
[ ] All Homeless
[X] Racial/Ethnic Group (Specify)

Five Year Period: (enter fiscal yrs.)
FY: 92 through FY: 96

Table 1B

UNAVAILABLE Totals

Category	Total (A)	Sheltered (B)	Unsheltered (C)
1. Number of Families with Children			
2. Number of Persons in families with Children			
3. Number of Individuals not in Families with Children			
4. Total Persons/Individuals (Lines 2+3)			

Table 1C
Special Needs
UNAVAILABLE

Category	Number of Families with Children*		Number of Individuals	
	Sheltered (A)	Unsheltered (B)	Sheltered (C)	Unsheltered (D)
1. Mentally Ill				
2. Drug Abuse				
3. Alcohol Abuse				
4. Victims of Domestic Violence				
5. Runaway/Abandoned Youth				
6. Other (specify)				

* Include families with head of household or spouse having the characteristics listed.

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CHAS Tables 1B & 1C

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

Homeless Population

Comprehensive Housing Affordability Strategy (CHAS)

Name of Jurisdiction(s) or Consortium:

CITY OF SAN DIEGO BLACK

Mark one:
[ ] All Homeless
[X] Racial/Ethnic Group (Specify)

Five Year Period: (enter fiscal yrs.)
FY: 92 through FY: 96

Table 1B

UNAVAILABLE

Totals

Category	Total (A)	Sheltered (B)	Unsheltered (C)
1. Number of Families with Children			
2. Number of Persons in families with Children			
3. Number of Individuals not in Families with Children			
4. Total Persons/Individuals (Lines 2+3)			

Table 1C
Special Needs

UNAVAILABLE

Category	Number of Families with Children*		Number of Individuals	
	Sheltered (A)	Unsheltered (B)	Sheltered (C)	Unsheltered (D)
1. Mentally Ill				
2. Drug Abuse				
3. Alcohol Abuse				
4. Victims of Domestic Violence				
5. Runaway/Abandoned Youth				
6. Other (specify)				

* Include families with head of household or spouse having the characteristics listed.

form HUD-40090 (6/14/91)

CHAS Tables 1B & 1C

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

Homeless Population

Comprehensive Housing Affordability Strategy (CHAS)

Name of Jurisdiction(s) or Consortium:

CITY OF SAN DIEGO

NATIVE AMERICAN

Mark one:
[ ] All Homeless
[X] Racial/Ethnic Group (Specify)

Five Year Period: (enter fiscal yrs.)
FY: 92 through FY: 96

Table 1B

UNAVAILABLE

Totals

Category	Total (A)	Sheltered (B)	Unsheltered (C)
1. Number of Families with Children			
2. Number of Persons in families with Children			
3. Number of Individuals not in Families with Children			
4. Total Persons/Individuals (Lines 2+3)			

Table 1C
Special Needs

UNAVAILABLE

Category	Number of Families with Children*		Number of Individuals	
	Sheltered (A)	Unsheltered (B)	Sheltered (C)	Unsheltered (D)
1. Mentally Ill				
2. Drug Abuse				
3. Alcohol Abuse				
4. Victims of Domestic Violence				
5. Runaway/Abandoned Youth				
6. Other (specify)				

* Include families with head of household or spouse having the characteristics listed.

form HUD-40090 (6/14/91)

CHAS Tables 1B & 1C

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

Homeless Population

Comprehensive Housing Affordability Strategy (CHAS)

Name of Jurisdiction(s) or Consortium:

CITY OF SAN DIEGO OTHER

Mark one:
[ ] All Homeless
[X] Racial/Ethnic Group (Specify)

Five Year Period: (enter fiscal yrs.)
FY: 92 through FY: 96

Table 1B

UNAVAILABLE Totals

Category	Total (A)	Sheltered (B)	Unsheltered (C)
1. Number of Families with Children			
2. Number of Persons in families with Children			
3. Number of Individuals not in Families with Children			
4. Total Persons/Individuals (Lines 2+3)			

Table 1C
Special Needs
UNAVAILABLE

Category	Number of Families with Children*		Number of Individuals	
	Sheltered (A)	Unsheltered (B)	Sheltered (C)	Unsheltered (D)
1. Mentally Ill				
2. Drug Abuse				
3. Alcohol Abuse				
4. Victims of Domestic Violence				
5. Runaway/Abandoned Youth				
6. Other (specify)				

* Include families with head of household or spouse having the characteristics listed.

form HUD-40090 (6/14/91)

them. The single workers live frugally so that they can send money to their families. They need safe and sanitary housing, but it could be a congregate living arrangement. The growing number of families need family housing. According to the City of San Diego Property Department, there were only 36 housing units for farm workers located in the San Pasqual Valley. No farm worker housing exists in the North City West/La Jolla Valley and Tijuana River Valley/Otay Mesa areas. In the North City West/La Jolla Valley area, the City estimates several hundred farm workers and day laborers live in illegal, temporary encampments hidden in the underbrush. These encampments are typically unsanitary, lacking plumbing, heating, or cooking facilities.

Because the vast majority of the rural homeless come from small villages in Mexico and Central America, their supportive housing needs include education, health care and social services to help them gain the skills they need to improve their economic situation. They also need transportation to get to work and to seek work. Family housing should include a child care facility and be close to commercial and institutional facilities and transportation.

The housing and service needs of homeless families and individuals are many and varied. These include emergency shelter, transitional housing, social services such as job counseling/training, mental health services, and general health services. Existing service agencies indicate that a growing need exists for limited-term shelter or transitional facilities for homeless individuals and families.

The special needs of the homeless mentally ill, alcohol and drug abusers, victims of domestic violence and runaway and throwaway youth are group specific. Mentally ill homeless persons require housing supported by mental health care and counseling. Alcohol and drug abusers require treatment facilities and programs and social services support. Victims of domestic violence need shelter and social services designed to help them make the transition to independent living. Runaway and rejected youth require shelter and counseling and social services related to reuniting them with their families or enabling them to live independently. For those homeless with a dual diagnosis of mental illness and substance abuse, special treatment programs are needed.

The County Department of Health Services is participating in two new projects directed at assisting mentally ill homeless persons:

a. **Stewart B. McKinney/NIMH Homeless Research Demonstration Project:** In collaboration with the Department of Housing and Community Development and the San Diego Housing Commission, Mental Health Services is participating in a three-year research demonstration project targeting severely and persistently mentally ill homeless persons. Participants (360) are randomly assigned to one of four conditions involving case management services combined with various housing options.

b. **Collaborative Transitional Housing Project:** The San Diego Housing Commission is collaborating with County Mental Health Services and County Drug and Alcohol Services in an effort to develop a transitional, supported housing project for homeless persons managing severe and persistent mental illness and alcohol and/or drug abuse problems. This project is being developed with additional collaboration from the City of San Diego and Centre City Development Corporation.

2. At-Risk Population

The "at-risk" population are very low-income families and individuals, who upon loss of employment, would lose their housing and end up residing in shelters or being homeless. These families generally are experiencing a cost burden paying more than 30 percent of their income for housing or, more likely, a severe cost burden paying more than 50 percent of their income for housing. In the City of San Diego, 74,679 low-income households (60,980 renters and 13,699 homeowners) spend 30 percent or more of their income on housing, and 34,066 low-income households (30,652 renters and 3,414 owners) spend more than 50 percent of their income on housing. These households are at risk of becoming homeless.

Also included in this category are persons who cycle back and forth between homelessness and a situation where they are threatened with homelessness. Many chronically mentally ill persons find themselves in such a cycle. Programs targeted for the homeless population need to account for this cyclical factor.

But it is not only the very low-income households which are at risk. According to Lomas Mortgage USA, San Diego is the second least affordable city in the nation for housing. Sudden unemployment in a two-income family can precipitate homelessness when there is no housing available, to which the family can move down, that is less costly. Overall, Harvard University estimates that nationally the average household is just four paychecks away from being homeless.

The at-risk population also includes individuals who are in imminent danger of residing in shelters or being unsheltered, because they lack access to permanent housing and do not have an adequate support network such as a parental family or relatives in whose homes they could temporarily reside. These individuals, especially those being released from penal, mental, or substance abuse facilities, require social services that help them make the transition back into society and remain off the streets. Needed services include counseling, rental assistance, and job training/assistance.

C. Supportive Housing Neess for Others with Special Needs

1. Current Estimates

This section provides the number of households of persons with special needs:

(1) people with disabilities;
(2) elderly with special needs; and
(3) persons with AIDS.

The sources for this information are the City of San Diego's 1991 draft Housing Element and the San Diego County Department of Health Services.

a. **Elderly and Frail Elderly:** Table 1A shows that approximately 65 percent of low-income elderly households are renters (24,456) and approximately 35 percent are owners (13,131). A substantial number of low-income elderly households (10,516 renters and 919 owners) pay more than 50 percent of their income for housing. The health and social needs of these elderly persons are significantly impacted when so much of their limited resources goes to housing.

According to the San Diego County Area Agency on Aging, the population over 65 years of age has four main concerns:

(1) Income - At least half of those who are over 65 and retired live on a fixed income.

(2) Health Care - Because the elderly have a higher rate of illness, easy access to good health care facilities is crucial.

(3) Transportation - Many seniors utilize public transportation. However, 13.8 percent of individuals age 65+ have a disability which prevents them from using public transportation.

(4) Housing - Of those over 65 years of age, 40 percent rent and 25 percent live alone (Countywide figures).

These characteristics indicate the need for smaller, low cost housing units which have easy access to public transportation and health care facilities. These factors should guide the development of new housing for low-income elderly households.

The housing needs of the elderly include supportive housing, such as intermediate care facilities, group homes, Single Room Occupancy (SRO) housing, and other housing that includes a planned service component such as personal care, housekeeping, meals,

personal emergency response, and transportation. A social worker should assist the elderly returning to the community from a health care institution.

Supportive services for households of the elderly and frail elderly are provided, in part, by the Area Agency on the Aging (AAA) in San Diego County. The major goals of the AAA are to secure maximum independence for the elderly, to prevent unnecessary institutionalization, to reduce isolation and loneliness, to improve health and well-being, to assist the vulnerable or frail elderly, and to ensure quality of life in long-term care facilities.

The AAA services include meals at senior centers, meals to homebound seniors, legal assistance, in-home support, adult day care, transportation, and part-time employment. These are made available through contracts with service providers. The AAA also offers services through an Information and Referral Program and a Long-Term Care Ombudsman Program. Case management services include a Multi-purpose Senior Services Program, the Linkages Program, a Management and Assessment of Social and Health Needs Program, and an AIDS Waiver Program.

b. **Persons with Physical Disabilities:** Based on the SANDAG factor of 7 percent of the total population, it is estimated that there are 28,426 households with a physically disabled member in the City of San Diego. This segment of the population is increasing due to lower fatality rates and higher longevity rates resulting from advances in medicine. The special needs required for housing physically disabled individuals include not only affordability but also special construction features to provide for access and use according to the particular disability of the occupant. The location of housing for disabled people is also important because many such households need access to a variety of social services and to other specialized handicapped accessible services throughout the City and surrounding area. In addition to the housing needs of physically disabled persons described above, there should be support services designed to meet the needs of the particular individual. A social worker should assist persons returning to the community from a health care institution.

c. **Persons with Mental Illness:** The following section provides conservative estimates of the needs of mentally ill persons based on the best available data. Using the California Department of Mental Health standard that 1 to 2 percent of persons suffer a serious mental illness, it is estimated that 17,090 adults, out of 854,487 in the City of San Diego, suffer a serious and persistent mental illness. Among those persons, there is a substantial need for stable, decent housing.

The lack of access to this basic need often leads to mentally ill persons being homeless, near homeless or living in unstable and/or substandard housing situations. It is estimated, by the Regional Task Force on the Homeless, that one-third of persons who

are homeless also suffer from serious and persistent mental illness. Based on the City's 1990 Census figures, this represents over 1,600 persons in the City.

An estimated 50 percent of the homeless mentally ill also have substance abuse problems. In the City of San Diego, this translates to 800 persons. Residential facilities, which address the multiple needs of this population, are not sufficient in number to serve this existing population.

A major barrier to stable, decent housing for the seriously mentally ill is the availability of affordable housing. A substantial majority of persons in this population depend solely on Social Security insurance payments of approximately $600 per month; based on federal housing standards, affordable rent payments should be slightly over $200. Relative to their income, few persons in this population can afford rental housing on the open market.

Of those persons living in the urban San Diego County area who are being served by San Diego County Mental Health Services (SDMHS), approximately 80 percent have an annual income of $12,000 or less, which is below the $13,600 maximum annual gross income for the Section 8 program.

d. **Persons with Developmental Disabilities:** Area Board XIII, the advocacy organization for developmentally disabled persons in San Diego County, states that 25,450 to 54,620 developmentally disabled persons reside in the County. However, the Department of Developmental Services in Sacramento reports in a recent study that the number is closer to 25,450 for San Diego County.

Group homes have been historically cited in the Annual Program Development Fund Needs Assessment as a viable housing option for developmentally disabled persons. The San Diego County Regional Center (SDCRC) prepares a Resource Development Plan annually which is presented to the State Department of Developmental Services. SDCRC's philosophy is that all developmentally-disabled adults who are unable to live on their own should reside in group homes with 6 or less persons. SDCRC reports that in the past year, there were at least 49 developmentally-disabled persons whose housing needs were left unmet for six months.

e. **Persons with the HIV Infection and with AIDS:** The following provides a rough estimate of current and future housing assistance needs for persons living in San Diego County with the HIV infection, and with AIDS. These estimates are based on assumptions rather than solid data. The figures should be regarded as a "best guess" given current knowledge, particularly when they are broken down into small numbers by individual jurisdictions.

Most available HIV/AIDS planning documents have not attempted to estimate or project housing needs. Several reports, however, have estimated that 5 percent of all people with HIV infection may need 90 days of temporary shelter during the course of a year, and that 5 percent of persons with AIDS need group home or long-term residential placement of up to 12 months[1].

County-wide Estimates: It is estimated that there are 29,000 to 30,000 persons with HIV infection in San Diego County. Five percent of that total would indicate that 1,450 to 1,500 people with HIV infection will need 90 days of temporary shelter during 1991 (130,000 to 135,000 bed-days, or a daily average of 350 to 370 beds). This number would still be within the expected range for 1992-1995.

To estimate the number of people living with AIDS in the County of San Diego, proportional estimates were derived from State projections for 1991 and 1992. It was then assumed that similar growth in numbers of persons living with AIDS will occur through 1995.

AIDS CASE PREVALENCE AND HOUSING NEEDS PROJECTIONS FOR SAN DIEGO COUNTY*

Year	Persons living with the HIV infection and with AIDS	5 percent in need of temporary housing
1991	2,400	120
1992	3,200	160
1993	4,250	212
1994	5,650	282
1995	7,500	375

* Based on State projections for 1991 and 1992, assumes 33 percent increase beyond 1992.

Estimates by Specific Jurisdictions: The only basis to estimate distribution of HIV infection and/or AIDS by jurisdiction within the County is through zip code analysis of an individual's place of residence at the time of diagnosis. Assumptions must then be made that this distribution does not change over time, and that HIV infection is distributed in the same proportions as AIDS case reporting.

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[1]The numerical data in this section was obtained from Steve Eldred, Office of AIDS Coordination, Department of Health Services, County of San Diego.

The percentage of cumulative case reporting in the City of San Diego, as a percentage of the regional total, is 79 percent. This translates to 1,747 cases when applied to the County case total of 2,211. This proportion of the County-wide estimates is also applicable in terms of 90-day shelter and long-term housing needs for 1991. Long-term housing need estimates for this population should be increased 33 percent annually through 1995.

f. **Foster Children:** The County Foster Care Program is financed by the State of California. Under this program, a licensed family may receive $350-$500 a month for each foster child. The average number of monthly placements of foster children rose to 6,283 in 1989-90 from 2,781 placements in 1984-85, an increase of 126 percent.

Inadequate housing for families seeking foster care placement of children is not significant. The housing needs of foster children are greatest when the foster child reaches the age of 18 years and no longer qualifies for State-funded foster care. It is estimated that one-third of those currently in foster care will become homeless when they reach the age of 18 years.[2] According to the Child Services Division of the County of San Diego Health Services Department, rental assistance is the best way to prevent homelessness among foster care children reaching the age of 18 years.

g. **Families Participating in Self-Sufficiency Program:** The San Diego Housing Commission estimates that between 1992-96, approximately 450 households currently on the federal Section 8 Rental Assistance Program waiting lists will participate in a Housing Authority self-sufficiency program. Greater participation in the self-sufficiency program is likely if the Housing Authority is successful in securing more federal funding for this program than is currently anticipated. The Housing Authority is currently formulating a self-sufficiency program to address the federal legislation which mandates this program in 1993.

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[2]The numerical data in this section was obtained from the Office of Child Services, Department of Health Services, County of San Diego.

PART 2. MARKET AND INVENTORY CONDITIONS

Part 2 summarizes local housing market and inventory characteristics, including trends in population, household formation and housing, as well as information on the assisted housing and public housing stock. It also summarizes the facilities and services available for homeless persons and other persons with special needs.

A. Housing Conditions

1. Population and Minority Data

Table 2A, "Population and Minority Data", provides 1990 U.S. Census data for the City of San Diego on the total population, and the numbers classified as White (non-Hispanic), Black (non-Hispanic), Hispanic (all races), Native American, Asian and Pacific Islanders (including "other"). It provides similar information from the 1980 U.S. Census.

The 1990 population totals 1,110,549 persons, of which 59 percent are White, 20.6 percent are Hispanic, 11 percent are Asian and Pacific Islanders/and Other, 9 percent are Black, and .4 percent are Native American (See Figure 3: Population and Minority Data). Four percent of the population, or 48,867 persons, live in group quarters. Of the 48,867 persons, 7,114 live in institutional quarters and 41,753 live in non-institutional quarters.

From 1980-1990, the percentage of whites decreased from 69 to 59 percent. Hispanics and Asian/Pacific Islanders and Other registered the greatest increases, from 15 to 20.6 percent and from 7 to 11 percent for the same time period, respectively. Blacks and Native Americans remained relatively constant as percentages of total population.

2. Low-Income and Minority Concentrations

One of San Diego's greatest assets is its diversity--diversity in terms of its people and its neighborhoods (See Figure 4: Neighborhoods of the City of San Diego). Many of the neighborhoods reflect a microcosm of residents from various cultural and economic groups who live together harmoniously and share a sense of community. However, San Diego, like many other cities, also has areas which are highly concentrated with low-income households and areas which are highly concentrated with minority households. Low-income concentrations have been exacerbated from the siting of many government-sponsored projects in areas of the city which were already economically depressed. Many minority concentrations evolved through discriminatory practices aimed at steering minority households, of various income levels, into certain portions of the city. The City, through its Housing Commission, began assuming a lead role in addressing these concentrations, when it adopted a public housing site-selection policy

CHAS Tables 2A

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

Population and Minority Data

Comprehensive Housing Affordability Strategy (CHAS)

Name of Jurisdiction(s) or Consortium:

CITY OF SAN DIEGO

Five Year Period: (enter fiscal yrs.)
FY: 92 through FY: 96

Category	1980 Census Data (A)	1990 Census Data or Current Estimate (B)
1. Total Population	872,957	1,110,549
2. White (Non-Hispanic)	601,960	651,735
3. Black (Non-Hispanic)	76,187	98,852
4. Hispanics (All races)	130,613	229,519
5. Native American	6,481	5,052
6. Asian and Pacific Islanders*	57,716	125,391
7. Group Quarters	63,319	48,867
8. Instutional	6,839	7,114
9. Non-institutional	56,480	41,753
10. Household Population	812,219	1,061,682

* INCLUDES RACE CATEGORY 'OTHER'.

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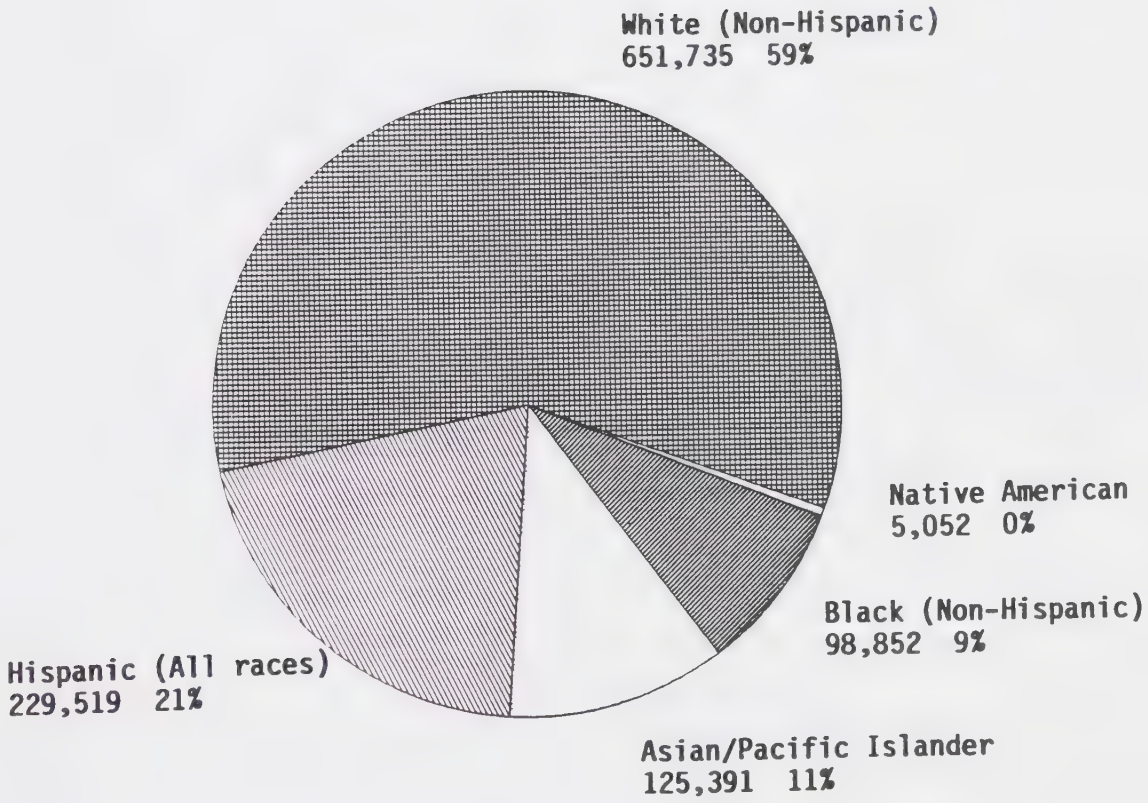
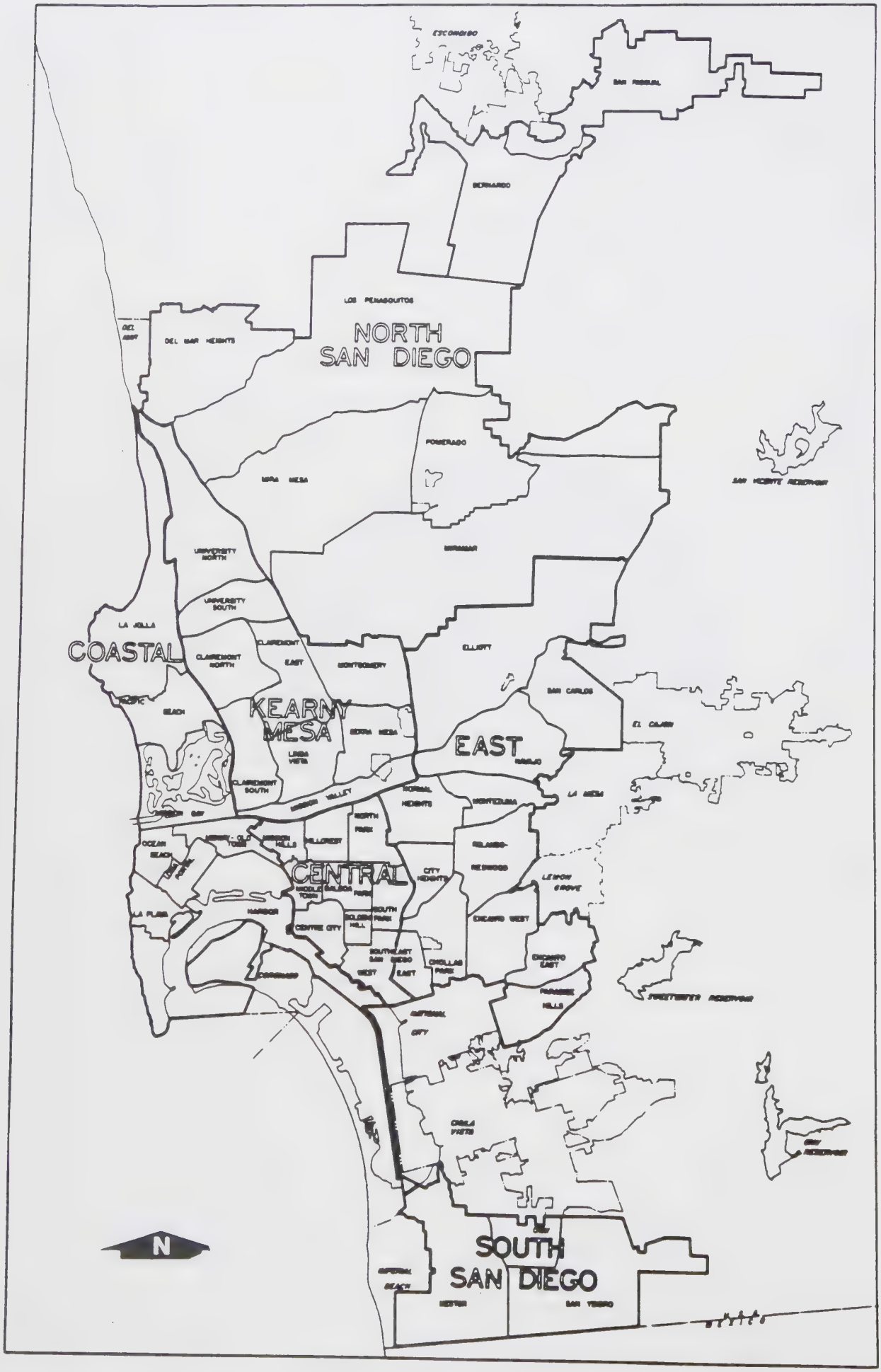
FIGURE 3: POPULATION AND MINORITY DATA



City of San Diego (1990 Census Data)

FIGURE 4 - CITY OF SAN DIEGO NEIGHBORHOOD MA



and a Section 8 integrative program both of which are geared towards implementing the public housing and Section 8 programs in unconcentrated areas. The City will now expand on this policy. In the future, when undertaking projects funded through other low- and moderate-income programs the City will give first consideration to sites located in unconcentrated areas, as well. This policy will afford low- and moderate-income households greater opportunity in choosing a neighborhood in which to reside, thereby promoting communities which are more economically and racially balanced.

a. **Concentrations of low-income households:** Concentrations of very low- and low-income households (all households earning no more than 80 percent of median area income) were identified using 1990 income estimates provided by SourcePoint. The estimates are based on 1980 census tracts. Four gradations of concentration were used:

00.0 - 20.9% Minimally Concentrated Census Tracts
21.0 - 40.9% Marginally Concentrated Census Tracts
41.0 - 60.9% Concentrated Census Tracts
61.0+% Highly Concentrated Census Tracts

Those census tracts which fall into these categories are noted below. A graphic representation of this information is contained in Figure 5 (See Figure 5: Low-Income Concentration Map). Also, a 1980 census tract and council district map, which reflects 1980 census tracts and 1980 council districts only, and no data, is contained on page 38 in Figure 7 (Figure 7: 1980 Census Tracts and Council Districts). The map can be used to help identify the location of the following tracts as well as those noted under section b.

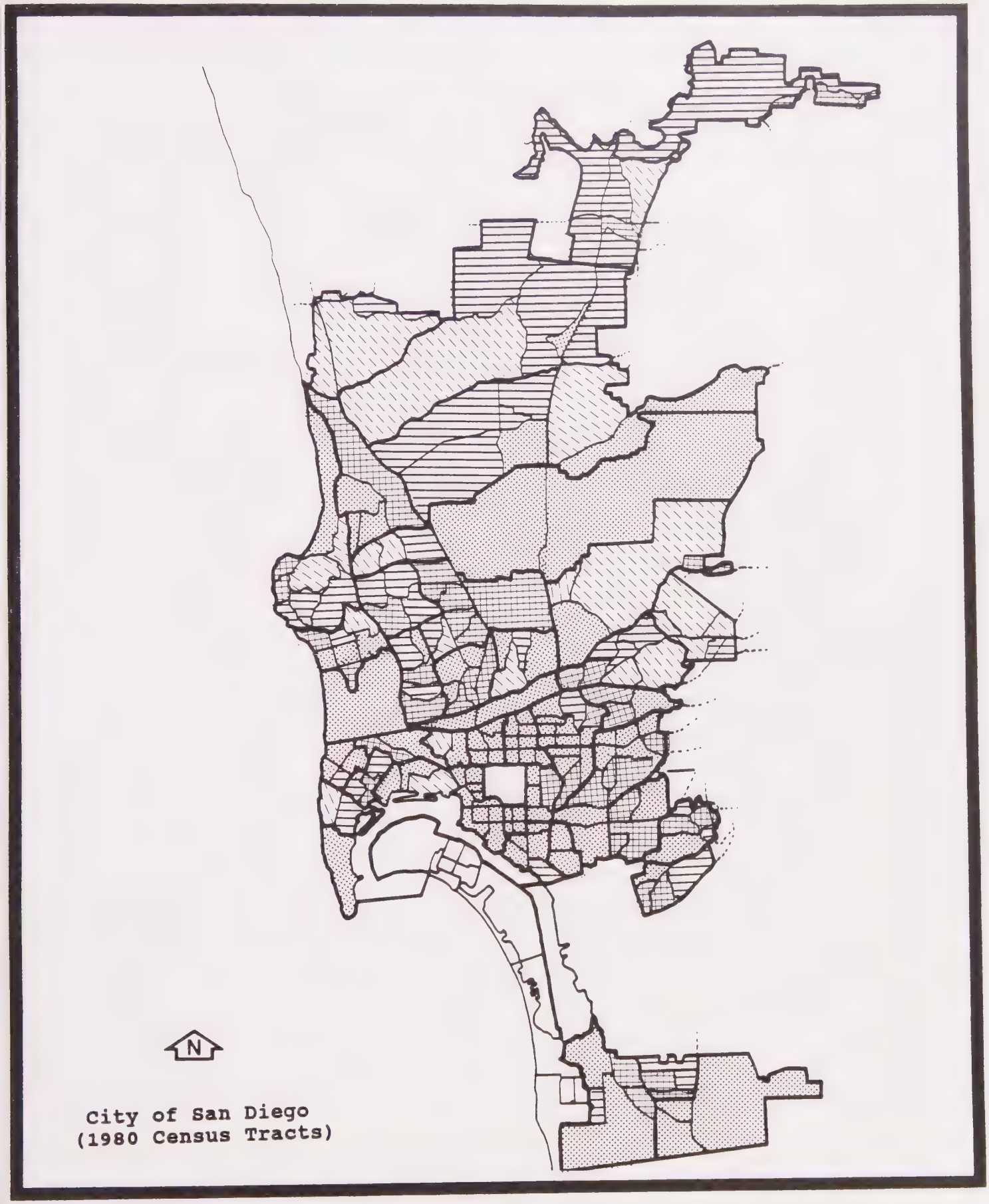
(0-20.9%): 1.00, 62.00, 72.00, 83.01, 83.03, 83.06, 83.07, 83.13, 83.23, 83.24, 85.13, 92.02, 95.02, 95.03, 97.05, 97.06, 98.01, 98.04, 98.05, p/o 170.05, p/o 170.06, 170.12, p/o 173.02.

(21-40.9%): 20.01, 31.07, 32.06, 38.00, 69.00, 70.02, 71.00, 73.02, 80.02, 81.02, 83.10, 83.11, 83.14, 83.18, 83.20, 83.21, 83.22, 85.01,85.02, 85.04, 85.12, 91.01, 91.04, 93.01, 96.02, 97.03, 97.04, 98.02, 100.01, 100.03, 101.04, 113.00, 170.13, 170.15, 170.16, 170.17, p/o 204.00, 207.03, p/o 207.04.

(41-60.9%): 20.02, 25.02, 27.05, 27.06, 28.01, 28.02, 29.03, 30.01,31.01, 31.02, 31.03, 31.05, 32.02, 32.03, 34.01, 42.00, 68.00, 70.01, 77.00, 80.01, 81.01, 82.00, 83.17, 85.03, 85.05, 85.06, 85.07, 85.09, 85.10, 85.11, 87.02, 88.00, 89.00, 91.03, 91.05, 96.03, 96.04, 100.02, 100.04, 101.06, 101.07, 166.06, 170.14, p/o 208.00.

(61+%): 2.00, 3.00, 4.00, 5.00, 6.00, 7.00, 8.00, 9.00, 10.00, 11.00, 12.00, 13.00, 14.00, 15.00, 16.00, 17.00, 18.00, 19.00, 21.00, 22.00, 23.00, 24.00, 25.01, 26.00, 27.01, 27.02, 27.03, 27.04, 29.01, 29.02, 30.02, 31.04, 33.00, 34.02, 35.00, 36.00,39.00, 40.00, 41.00, 43.00, 44.00, 45.00, 46.00, 47.00, 48.00, 49.00, 50.00, 51.00, 52.00, 53.00, 54.00, 56.00, 57.00, 58.00, 59.00, 60.00, 61.00, 63.00, 64.00, 65.00, 66.00, 74.00, 75.00, 76.00, 78.00, 79.01, 79.02, 83.05, 83.12, 83.15, 83.16, 83.19, 86.00, 87.01, 90.00, 91.02, 92.01, 93.03, 93.04, 94.00, 95.01, 95.04, 99.01, 100.05, 100.06, 100.07, 101.03, 101.05, 170.18.

FIGURE 5 - LOW-INCOME CONCENTRATION MAP



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Low-Income Concentrations

0.0 - 20.9%

21.0 - 40.9%

41.0 - 60.9%

61+

b. <u>Concentrations of Minority Households</u>: Concentrations of minority populations were identified using 1990 census data applied 1980 census tracts. Again, four gradations of concentrations were used:

00.0 - 20.9% Minimally Concentrated Census Tracts
21.0 - 40.9% Marginally Concentrated Census Tracts
41.0 - 60.9% Concentrated Census Tracts
61.0+% Highly Concentrated Census Tracts

Those census tracts which fall into these categories are noted below. A graphic representation of this information is contained in Figure 6 (See Figure 6: Minority Population Map).

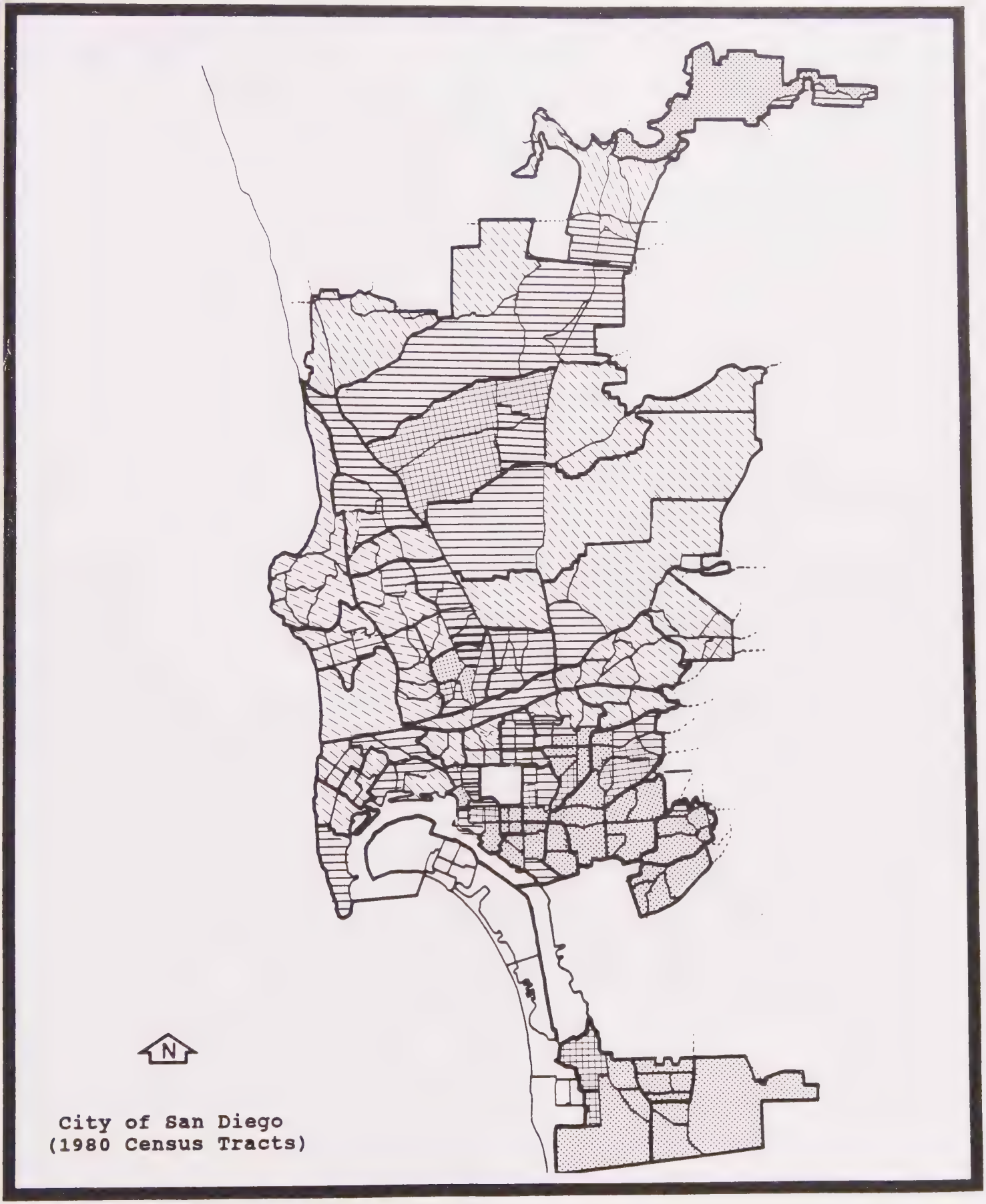
(0-20.9%): 1.00, 2.00, 3.00, 4.00, 5.00, 6.00, 7.00, 19.00, 20.01, 20.02, 28.01, 28.02, 29.01, 60.00, 62.00, 69.00, 70.01, 70.02, 71.00, 72.00, 73.01, 73.02, 74.00, 75.00, 76.00, 77.00, 79.01, 79.02, 80.01, 80.02, 81.01, 81.02, 82.00, 83.01, 83.03, 83.06, 83.07, 83.10, 83.11, 83.12, 83.13, 83.14, 83.15, 83.23, 83.24, 85.01, 85.03, 85.04, 85.11, 85.12, 85.13, 91.01, 91.02, 91.03, 91.04, 91.05, 93.04, 95.02, 95.03, 95.04, 96.02, 96.03, 96.04, 97.03, 97.04, 97.05, 97.06, 98.01, 98.02, 98.04, 98.05, 166.06, p/o 170.05, p/o 170.06, 170.12, 170.14, 170.15, 170.16, p/o 173.02.

(21-40.9%): 8.00, 9.00, 10.00, 11.00, 12.00, 13.00, 14.00, 15.00, 17.00, 18.00, 21.00, 27.02, 29.02, 29.03, 38.00, 42.00, 43.00, 54.00, 56.00, 57.00, 59.00, 61.00, 63.00, 64.00, 65.00, 68.00, 78.00, 83.05, 83.16, 83.17, 83.19, 83.20, 83.25, 85.02, 85.05, 85.06, 85.07, 85.09, 85.10, 87.01, 87.02, 89.01, 92.01, 92.02, 93.01, 93.03, 93.04, 94.00, 95.01, 99.01, 170.13, 170.17, 170.18, p/o 204.00, p/o 207.04, p/o 208.00.

(41-60.9%): 16.00, 25.02, 27.03, 27.05, 27.06, 44.00, 52.00, 53.00, 55.00, 66.00, 83.18, 83.21, 83.22, 90.00, 101.03, 101.04.

(61+%): 22.00, 23.00, 24.00, 25.01, 26.00, 27.01, 27.04, 30.01, 30.02, 31.01, 31.02, 31.03, 31.05, 31.07, 31.09, 31.10, 32.01, 32.02, 32.03, 32.08, 32.09, 32.10, 33.00, 34.01, 34.02, 35.00, 36.00, 39.00, 40.00, 41.00, 45.00, 46.00, 47.00, 48.00, 49.00, 50.00, 51.00, 58.00, 86.00, 88.00, 100.01, 100.02, 100.03, 100.04, 100.05, 100.07, 100.08, 100.09, 101.06, 101.07, 101.08, 101.09, 207.03.

FIGURE 6 - MINORITY CONCENTRATION MAP



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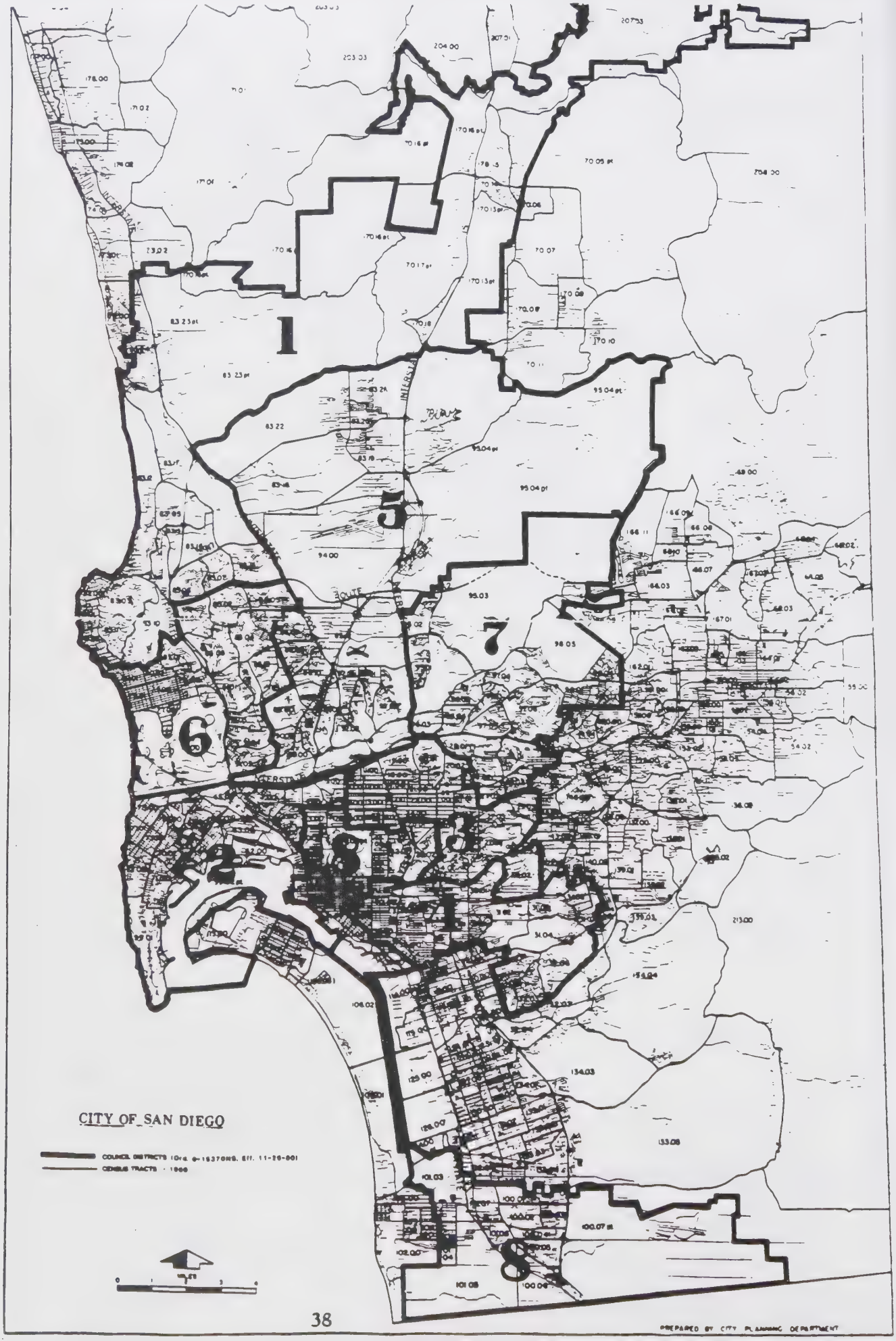
Minority Concentrations

0.0 - 20.9%		41.0 - 60.9%	
21.0 - 40.9%		61+	

FIGURE 7: 1980 CENSUS TRACTS AND COUNCIL DISTRICTS



PREPARED BY CITY PLANNING DEPARTMENT

3. Housing Stock Inventory

Table 2B, "Market and Inventory Condition--Housing Stock Inventory", provides data for the City of San Diego on the total number of year-round housing units by occupancy status. Table 2B also provides information on housing size (i.e., number of bedrooms) and conditions based on the 1987 HUD American Housing Survey for the San Diego Metropolitan Area and the 1988 City of San Diego Housing Assistance Plan (HAP).

There are a total of 442,018 dwelling units, of which 94 percent are occupied and 6 percent are vacant. Of the 416,014 occupied units, 216,327 (52 percent) are renter occupied. The remainder, 199,687 (48 percent) are owner occupied units. Of the 26,004 vacant units, 14,042 are available for rent and 4,213 are available for sale (See Figure 8: Housing Tenure).

According to regional percentages, of the total housing stock, 18 percent have zero to one bedroom, 37 percent have two bedrooms, and 45 percent have three or more bedrooms. Of the total rental stock (occupied and for rent), 32 percent have zero to one bedroom, 48 percent have two bedrooms, and 19 percent have three or more bedrooms.

Of the total housing stock which is either occupied or available for rent or sale, approximately 27,400 units are needing rehabilitation. There are 1,643 housing units that are not rehabbable.

Demand for all housing units, as measured by vacancy rates, varies by rent level and location. In general, units demanding lower rents tend to have lower vacancy rates than do higher rent units. Although the overall vacancy rate (January 1, 1991) for the City of San Diego was 5.9 percent, indicating overall market balance, a much lower vacancy rate exists for lower rent units indicating a still unmet demand for this housing.

a. **Significant Market and Inventory Conditions:** According to DataQuick, the median resale housing price in the San Diego region in June 1991 was $183,000. The cost of housing in the City of San Diego varies considerably by area. The communities of East San Diego ($121,000) and Southeast ($79,000) for example, fall below the regional median while Point Loma ($342,000) and La Jolla ($625,000) are significantly above (San Diego Union, July 28, 1991). The California Association of Realtors estimates that only 21 percent of all households in the San Diego region could afford to buy the median priced home in 1990. Given these numbers, it is unlikely, without government assistance, that many low- and moderate-income families will achieve the American dream of homeownership.

   The renter affordability gap, as defined by those low- and moderate-income renter households experiencing a cost burden (the household is paying more than 30 percent of its income) or severe cost burden (the household is paying more than 50 percent of its income) is 71,726 and 36,054 respectively (See Table 1A).

CHAS Table 2B

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

Market and Inventory Conditions
Housing Stock Inventory

Comprehensive Housing Affordability Strategy (CHAS)

Name of Jurisdiction(s) or Consortium:

CITY OF SAN DIEGO

Five Year Period: (enter fiscal yrs.)
FY: 92 through FY: 96

Check one:
[ ] 19___ Census
[X] Current Estimate as of: (enter date)
OCTOBER 1, 1991

Category	Total (A)	0 or 1 bedrooms (B)	2 bedrooms (C)	3 or more bedrooms (D)
1. Total Year-Round Housing	442,018	79,563	163,547	198,908
2. Total Occupied Units	416,064	70,772	153,925	191,367
3. Renter Occupied Units	216,327	69,225	103,837	43,265
4. Needing Rehab	17,306	5,538	8,307	3,461
5. Not Rehabbable	1,038	332	498	208
6. Owner Occupied Units	199,687	9,984	55,912	133,791
7. Needing Rehab	8,786	439	2,460	5,887
8. Not Rehabbable	527	26	148	353
9. Total Vacant Units	26,004	7,541	11,442	7,021
10. For Rent	14,042	4,915	7,583	1,544
11. Needing Rehab	1,123	393	607	123
12. Not Rehabbable	67	24	36	7
13. For Sale	4,213	379	1,306	2,528
14. Needing Rehab	185	17	57	111
15. Not Rehabbable	11	1	3	7
16. Awaiting Occupancy or Hold				
17. Other				

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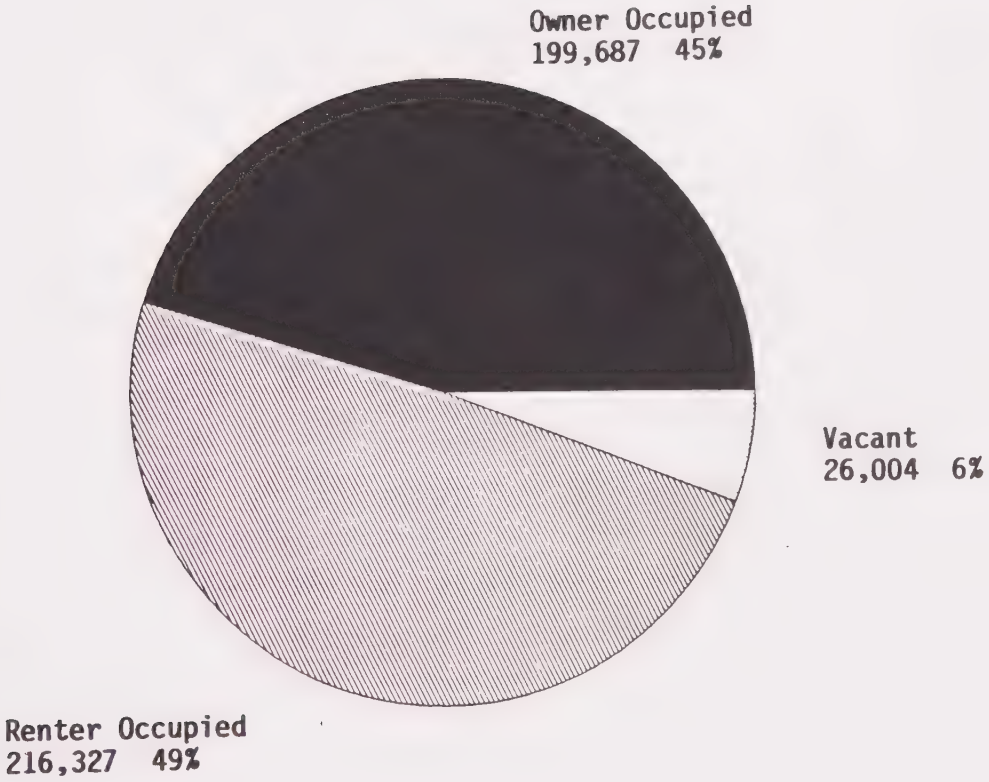
FIGURE 8: HOUSING TENURE



City of San Diego

Potential constraints upon the maintenance, improvement or development of housing are discussed in two contexts: governmental and non-governmental. Governmental constraints include Article 34 of the California Constitution, land use controls, building codes, site improvements, Proposition 13, development fees, and processing and permit procedures. These constraints can be mitigated by the City through a variety of means, including: designation of large amounts of land for all types of residential development, full or partial waiver of development fees for affordable housing, and expedited permit processing.

Non-governmental constraints include land costs, construction costs, and financing. All three of these costs tend to be determined at the regional, State and national levels by a variety of private and public actors. Local jurisdictions, therefore, often have little influence or control over these cost constraints.

4. Assisted Housing Inventory

Table 2C, Assisted Housing Inventory, provides data on housing stock by various government assistance programs. Out of a total of nearly 18,000 assisted units, there are 9,948 project-based tenant assisted units and 7,854 tenant-based assisted units. The City also has more than 4,500 affordable units assisted through a local density bonus program and through a low-interest first-time home buyer program. The low-interest home buyer program is financed with federal mortgage revenue bonds. In addition, there are 6,099 military units restricted to lower-grade enlisted personnel with income limits.

a. **At-risk Rental Units:** The City does not anticipate the loss of rental housing from the assisted housing inventory through public housing demolition or conversion to homeownership during the time frame of this CHAS. According to the California Housing Partnership Corporation, the City presently has forty-eight projects that could be classified as at risk of conversion to homeownership or through prepayment or voluntary termination of a Federally assisted mortgage with the earliest possible termination date in parentheses: Seaward Arms (1990), Coronado Terrace I (1991), Crandall Apartments (1991), Logan Square Gardens (1991), Coronado Terrace II (1992), Delta Arms (1991), Del Prado (1991), Bay Vista Methodist Heights (1993), Villa Nueva (1993), Westminister Manor (1993), St. Paul's Manor (2003), Guadalupe Plaza (2003), Mariner's Cove (2004), University Canyon North (2004), Kiku Gardens (2004), Vista Terrace Hills (1990), Prince Hall (1993), Cathedral Plaza (1993), Sorrento Tower (1994), La Jolla Marine (1994), Lions Community Manor (2002), Villa Merced (2002), Cathedral Arms (1993), Grace Tower (1993), Cerro Pueblo (1993), Casa Colina (1993), Lakeshore Villa (1993), Euclid Avenue (1993), Genesee Park (1992), R.S. Vermilya Apartments, (1992), Grant Heights (1992), President John Adams Manor III (1992), Mt. Aguilar (1991), Penasquitos Gardens (1991), President John Adams Manor (1991),

CHAS Table 2C

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

Assisted Housing Inventory

Comprehensive Housing Affordability Strategy (CHAS)

Name of Jurisdiction(s) or Consortium:

CITY OF SAN DIEGO

Five Year Period: (enter fiscal yrs.)
FY: 92 through FY: 96

Current Estimate as of: (enter date)
[X] Current Estimate as of: (enter date)
OCTOBER 1, 1991

Category	Total Stock and Inventory				
	Total (A)	SRO (B)	0 or 1 bedrooms (C)	2 bedrooms (D)	3 or more bedrooms (E)
1. Project Based Tenant Assistance	9948				
2. Public Housing	1079				
3. Section 202	1339				
4. Section 8	2485				
5. Other HUD	5045				
6. FmHA	0				
7. Tenant Based Tenant Assistance	7854				
8. Section 8	7423				
9. Other State/Local	431				
10. Homeowner Assistance	0				

form HUD-40090 (5/16/91)

Imperial Villa (1991), Horton House (1991), Green Manor (1990),Luther Tower (1990), Meadowbrook II (1990), Lancaster (1990), San Diego Square (1991), Second Imperial Manor (1991), San Diego Leisure Life Village (1987), Meadowbrook I (1989), Penasquitos Village (1989), Trinity Manor (1990), and Wesley Terrace (1990).

5. Use of Funds

The City of San Diego will continue to rely on a multi-faceted approach to provide affordable housing for San Diegans. A partnership comprised of the public sector, private sector, and non-profit entities will utilize a combination of resources to finance the new construction, acquisition, and rehabilitation of housing affordable to lower-income families, as well as the provision of rental assistance and support services. This varied approach is well suited for San Diego, which has an existing housing stock that is in generally good condition, yet has ample remaining opportunity for renovation (as indicated in Table 2B); new housing will also be added to address currently unmet needs and to accommodate future growth.

B. Inventory of Facilities and Services for Homeless Persons

The narrative for this section is reflective of the City of San Diego's funding of homeless facilities and services.

1. Emergency Shelters and Transitional Housing Facilities

According to the Regional Task Force on the Homeless, San Diego has approximately 1,435 bed spaces available for homeless individuals and families. This number can expand to accommodate more than 1,600 people during periods of inclement weather. Shelters and programs for homeless individuals and families are noted in Table 2.1. They range from a bed for the night to highly structured transitional programs which combine housing with support services. Some of these shelters and programs are highlighted below; they are arranged in three categories: (1) Emergency Shelters, (2) Transitional Shelters, and (3) Shelters serving Special Populations.

Programs that the City of San Diego provides full or partial funding for are listed below:

a. <u>Interfaith Shelter Project</u> - A joint effort of the City, County, and the San Diego Housing Commission. This project is designed to enlist churches, synagogues, and community organizations to participate in sheltering homeless individuals during the cold/winter season. Each host facility provides shelter to 12-14 homeless individuals for a two-week period. The project staff provides technical assistance, coordinates dates when the sites are to be open, and makes community presentations about the program.

Table 2.1
Shelters for the Homeless
City of San Diego

Shelters and Programs

Casa de Paz	Case Managed	Woman & Children		30
Catholic Charities/METRO House of Rachel	Transitional	Single Women		11
CWSS-Project Safehouse	Case Managed	Women & Children		9
Dust-Off	Transitional	Single Men (Veterans)		18
Emmanuel House	Night Shelter	Single Women		8
Emmanuel House	Night Shelter	Single Men		15
* ECS - Capri Hotel	Transitional	Single Men		8
ECS - Juilan Anchorage	Transitional	Women W/Children		15
ECS - Nu Hotel	Case Managed	Parolees		60
ECS - Short Term	Case Managed	Single Adults		45
ECS - Trans. Hsg. Program	Transitional	Men & Women		14
Forgotten in America	Case Managed	Single Adults		5
* ISN - PB/La Jolla	Case Managed	Single Men	Oct-May	12
ISN - Pt. Loma	Case Managed	Single Men	Dec-Mar	12
ISN - College Area	Case Managed	Single Men	Nov-Jan	12
ISN - Clairemont	Case Managed	Mixed	Nov-Dec	12
ISN - North Park	Case Managed	Mixed	Jan-Mar	12
ISN - Southeast	Case Managed	Mixed	Feb-Mar	12
ISN - Wings	Transitional	Families		20
Landing Zone	Case Managed	Single Men, Women & Children		60+
S.D. Co. Mental Health Services	Case Managed	Mixed		34
St. Vincent de Paul (SVdP) Emergency	Case Managed	Singles & Families		165
SVdP Maher Center	Night Shelter	Single Men		160
*** SVdP - Transitional Housing Program	Case Managed	Singles & Families		110
SVdP - Transitional Housing Program	Case Managed	Singles & Families		45
SVdP - Joshua House (AIDS Clients)	Transitional	Singles		8
SVdP - Touissent Center	Case Managed	Youth		30
Salvation Army	Case Managed	Single Men		60
Salvation Army	Case Managed	Families		45
San Diego Rescue Mission	Night Shelter	Single Men		114
San Diego Rescue Mission	Case Managed	Single Men		135
*** SDYCS - The Bridge	Case Managed	Youth		6
SDYCS - The Gatehouse	Case Managed	Youth		6
SDYCS - The Storefront	Case Managed	Youth		15
SDYCS - Transitional Living Program	Case Managed	Youth (16-25)		13
SDYI - Southeast Emergency Quarters	Case Managed	Families		23
Safehouse Program	Case Managed	Single Men		6
Serenity House	Transitional	Men & Women		21
United States Mission	Night Shelter	Single Adults		35
YWCA - Women in Transition	Transitional	Single Women		14

Table 2.1 (con't)
Shelters for the Homeless
City of San Diego

Case Management Agencies

Catholic Charities
Community Christian Service Agency
Community Resource Center
Episcopal Community Services (ECS)
Heartland Human Relations
Neighborhood House Association
Presbyterian Crisis Center
Salvation Army
SDYCS - Help Center
SDYCS - Ocean Beach Comm. Services
Travelers Aid Society
Uptown Interfaith Service Center

Day Centers

Neil Good Day Center	*Day Center*	*Primarily Men*
Rachel's Womens Center	*Day Center*	*Women*

Total Beds: *(Including 72 ISN Seasonal Spaces)* **1435**

* *ECS = Espiscopal Community Services*
** *ISN = Interfaith Shelter Network*
*** *SVDP = St. Vincent de Paul*
*** *SDYCS = San Diego Youth Community Services*

b. Emergency Shelter Program - The project, operated by Episcopal Community Services, assists homeless individuals by making a minimum of 4 double occupancy rooms available per night at a leased facility downtown. The period of residency is limited to 30 days. In addition to physical shelter, support services, such as job search assistance, are an integral part of the program.

c. Homeless Shelter Facilities Program - St. Vincent de Paul operates a converted warehouse attached to their existing shelter facility that adds a minimum of 75 new beds to their sheltering capacity. The agency offers supportive screening, referral resource counseling, financial planning, independent living skills counseling, clothing and hygiene services.

d. San Diego Housing Commission - The Housing Commission provides funding for several homeless projects, including the St. Vincent de Paul Warehouse/Shelter Conversion Project, Episcopal Community Services Transitional Housing Project, and the YWCA Transitional Housing Project.

e. San Diego Youth Shelter Program - The City provides partial funding for this program which provides short term shelter for those youths who won't be returning to their homes.

f. San Diego Shelter Program - The City and its Housing Commission provide partial funding for the St. Vincent de Paul Bishop Maher Center, a short term emergency shelter program for men.

g. Women's Shelter Program - This is a program operated by Catholic Charities. Utilizing surplus property in a U.S. Post Office, it provides emergency shelter for homeless women. The City, through its Housing Commission, provided funds to rehabilitate the property for this purpose.

2. Day Shelters, Soup Kitchens and Other Facilities

a. Federal Emergency Management Agency (FEMA) - A Federal grant program which provides emergency assistance in the form of food and shelter. Funds are distributed to community agencies for approved shelter and food programs for the homeless.

b. Neil Good Homeless Day Center - This program, which is funded jointly by the City, County and Regional Task Force on the Homeless, provides day shelter for homeless persons. In addition, the Center provides such services as showers, laundry and temporary storage facilities.

3. **Social Service Programs for the Homeless**

a. **Employment Assistance Program for the Downtown Homeless** - A joint effort of the City and the San Diego Consortium and Private Industry Council to provide employment services to the homeless through Episcopal Community Services. The program has three components, identified as Track I - Casual/Temporary Labor; Track II - Pre-Employment Training; and Track III - On-the-Job Training. Appropriate supportive services (mail and message services, transportation, identification assistance, shelter and clothing) are provided within each Track.

b. **Info Line** - A joint effort of the City, County and United Way. The City's portion of the contract maintains a telephone help line service (549-0997) which is operational 5 days a week, Monday through Friday, between the hours of 8:00 a.m. and 9:00 p.m., and on weekends and holidays between the hours of 10:00 a.m. and 9:00 p.m. The help line provides lodging information as well as referrals to other agencies for emergency medical, food, or transportation services. There are four additional help lines for other parts of the region: North County Coastal (943-0997), North County Inland (740-0997), La Mesa and South County (425-0997) and Outlying Areas (1-800-227-0997).

c. **Legal Aid Society** - This project provides legal services in civil and criminal matters to persons who cannot afford legal services.

d. **Neighborhood House Association Food Bank** - This project assists agencies in providing food to low-income clients.

e. **Staff Assistance Project** - This is a joint effort of the City, County, and United Way. The City allocates one staff person to provide assistance to the Regional Task Force on the Homeless to aid them in their endeavor to expand the number of emergency night shelter facilities available in the San Diego area. In addition, the project is charged with the task of planning and coordinating the delivery of services designed to assist the homeless population in San Diego County.

f. **Love's Gift** - The City helps fund this perishable food program which collects excess food from local businesses and delivers it to the service agencies for distribution to the needy.

g. **Mayor's Holiday Program** - This program is operated three (3) days a year in December. The concourse of the City Administration Building is utilized to provide a variety of services including housing referral, clothing and hygiene services, and meals for the homeless.

h. Starter Kit Program - The City will provide funding to the Food Bank to distribute starter kits including basic food stuffs and household items to homeless persons and families moving into permanent housing.

4. Homeless Prevention Programs and Services

a. Housing Assistance - A portion of this contract with the Community Service Center for the Disabled assists disabled clients who are homeless, in locating affordable and accessible housing through its Housing Assistance component.

b. Rent/Security Deposit Program - The Emergency Resources Group operates a program, funded by the Housing Commission, which guarantees payment of the security deposit and last month's rent for eligible tenants seeking rental housing. This enables participants to secure housing without needing a substantial amount of funds to pay up front expenses.

C. Inventory of Facilities and Services for Persons with Other Special Needs

1. Elderly and Frail Elderly

A wide variety of facilities and services are presently available to serve the elderly population. Facilities for the elderly include licensed long-term care facilities, intermediate care facilities, unassisted living facilities, and senior centers. Among services for the elderly are: Adult day care, basic needs and resources (help for those temporarily unable to help themselves), crime/victim and legal services, education services, employment and training, emergency services, financial aid and benefits, health information, health services (inpatient and outpatient), housing services, in-home services, substance abuse services, and transportation services. The majority of elderly in the City of San Diego have access to these programs which operate either in the City or in neighboring jurisdictions.

2. Disabled Persons

A variety of facilities and services are available to serve disabled persons:

a. Mentally Disabled: Region-wide, facilities for the mentally disabled include hospitals, medical centers, outpatient clinics, mental health centers, counseling and treatment centers, socialization centers, residential facilities for children, crisis centers, and adolescent and adult day treatment offices.

Region-wide services which are available through the San Diego County Mental Health Services office and its contracting agencies include: Screening, emergency care, inpatient care, partial day treatment, 24-hour residential treatment, outpatient care, crisis intervention, community support, probationary services, forensic medicine, program review and development, case management, technical and administrative services, "Totline" telephone counseling (for parents of children up to five years of age), homeless outreach, AB 3632 (mental health services for children in special education), and volunteer services.

At present, there is a limited range of community-based rehabilitative and supportive housing options for persons not in crisis who need living accommodations. Current SDMHS housing resources for the region include the Supplemental Rate Program (providing board and care with supplemental services - 350 beds), Longterm/Transitional Residential Program (group living with supportive services - 26 beds), and Semi-Supervised Living Program (transitional living from the streets to group housing - 28 beds).

Additional resources outside the SDMHS system that are potentially available are referrals to Community Care Facilities (board and care) - approximately 1300 beds.

b. **Developmentally Disabled**. The San Diego Regional Center for the Developmentally Disabled is an information clearinghouse and provider of services for developmentally disabled persons. It is responsible for providing diagnostic counseling and coordination services. Regional centers serve as a focal point within the community through which persons with developmental disabilities and their families receive comprehensive services. The San Diego Regional Center is responsible for providing preventive services, including genetic counseling to persons who have or may be at risk of having a child with a developmental disability. They are also responsible for planning and developmental disabilities to ensure that a full continuum of services is available.

The United Cerebral Palsy Association of San Diego County provides communication training, prevocational testing and training, and social and recreational activities for developmentally disabled persons.

Training and Education for Retarded Individuals, Inc. (TERI) is a private, non-profit corporation created for the purpose of developing residential, educational and recreational programs designed to serve individuals with developmental disabilities.

c. **Physically Disabled Persons**. The majority of supportive services and housing assistance for physically disabled persons are provided through non-profit organizations. A primary provider is the Community Service Center for the Disabled Inc. (CSDC).

CSDC services provide physically disabled persons with assistance in living independently.

CSDC provides the following services:

Intake and Referral services are set up to meet individual needs and to seek appropriate services form CSDC or from other community agencies;

Personal Assistance helps disabled individuals obtain personal care attendants or homemakers, thus enabling them to live independently in their own homes;

Housing Referral assists individuals to obtain accessible and/or appropriate housing that meets their individual needs;

Benefits Counseling helps disabled individuals apply for public benefits to which they may be entitled, such as Supplemental Security Income (SSI), Medicare and Medi-Cal;

Employment Services are provided through the Job Club that focuses on pre-employment preparation skills;

Community Living Program offers case management services to help individuals move out of institutional environments;

Transition Project provides assistance to young adults with disabilities moving from a school setting to independent community living arrangement;

Peer Counseling furnishes services and opportunities for social contact and involves areas such as individual, marital, family, and sexual counseling;

Transportation supplies limited service on a fee basis for disabled individuals in need of transportation to medical, employment or personal appointments;

Spoke Shop is a business enterprise which offers medical supplies and sales, service and repair of durable medical equipment such as wheelchairs;

Public Relations and Development provides public information to the community, manages public relations events, produces fund development special projects, supervises volunteer coordination and membership recruitment.

3. AIDS

Facilities, available regionally, include residential units for persons with AIDS (five units containing fifty beds), six hospices, one skilled nursing facility, two resource centers, and eleven health centers/clinics. Of these, 11 beds are available at Truax House, a facility operated by AIDS Assistance Fund in a City-owned duplex. Facilities serve AIDS patients exclusively or in conjunction with other segments of the population.

Services for persons with AIDS, funded by the County of San Diego Department of Health Services through Title I of the Comprehensive AIDS Resources Emergency (CARE) Act of 1990, include primary health care, mental health counseling, in-home care and treatment services, dental, case management, recreation/social, outreach and education, and transportation services.

PART 3. STRATEGIES

A. Priorities for Housing Assistance

This section states the City of San Diego's general plans and housing priorities from October 1, 1991 to September 30, 1996. It flows from the City's overall analysis of needs and market and inventory conditions, as described in Parts 1 and 2.

The City recognizes that the extent to which its affordable housing needs can be addressed is limited by available resources and production capacity. Since all affordable housing needs cannot be met immediately, priorities have been established to determine how resources will be allocated among the many in need. San Diego has established priorities for assistance based on several factors including: the number of very low- and low-income families (including single person families) paying more than 30 percent of household income to cover housing costs, the extent of that burden (30-50 percent of income dedicated to housing costs or more than 50 percent of income dedicated to housing costs), and the cost of providing affordable rental and homeownership opportunities. Priorities also show a preference for long-term housing solutions, rather than emergency or temporary measures. The City's housing assistance priorities from October 1, 1991 through September 30, 1996 appear in Table 3 (page 54). First, second, and third priorities have been identified by ranking a variety of housing activities which are targeted to specific population groups.

1. First Priority Activities

As can be seen in Table 3, the City's first priority is to provide additional, and preserve existing, housing opportunities affordable to very low-income San Diegans through new construction, acquisition, and rehabilitation of rental housing, and through the provision of rental assistance. Table 1A, page 6, indicates that nearly 40,000 very low-income families in San Diego are burdened by housing costs in excess of 30 percent of their household income. More than 18,000 of these families pay more than half of their income to cover the cost of housing. These figures actually under-represent the situation since they do not take into account the approximately 3,600 affordable housing units in San Diego which may be lost due to the prepayment of federally subsidized mortgages by property owners and the resulting end of existing affordability restrictions.

The high cost of housing has a particularly severe impact on very low-income families who are left, following rent payment, with little disposable income to cover the costs of such vital items as food, clothing, health care, and transportation. Assistance focuses on the provision of affordable opportunities in rental housing since this housing type is less costly to provide (though still expensive) than homeownership opportunities, thus enabling San Diego to assist a greater number of families in need.

CHAS Table 3

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

Priorities for Assistance
5 – Year Plan

Comprehensive Housing Affordability Strategy (CHAS)

Name of Jurisdiction(s) or Consortium:

The City of San Diego

Five Year Period: (enter fiscal yrs.)

FY: 92 throgh FY: 96

	Activity	Renters				Owners				
		Elderly 1 & 2 Member Households (A)	Small Related (2 to 4) (B)	Large Related (5 or more) (C)	All Other Households (D)	Existing Homeowners (E)	First Time Homebuyers: With Children (F)	First Time Homebuyers: All Others (G)	Homeless Persons (H)	Other Persons with Special Needs (H)
Very Low–Income Persons	1. Moderate Rehabilitation / Acquisition	1	1	1	2	2	3	3	2	2
	2. New Construction, Substantial Rehabilitation, Related Infrastructure	1	1	1	2	2	3	3	3	3
	3. Rental Assistance	1	1	1	2				2	2
	4. Homebuyer Assistance						3	3		
	5. Support Facilities and Services	2	2	2	2	3	3	3	2	2
Other Low–Income Persons	6. Mod Rehabilitation / Acquisition	2	2	2	3	2	2	3	3	3
	7. New Construction, Substantial Rehabilitation, Related Infrastructure	3	2	2	3	2	3	3	3	3
	8. Rental Assistance	3	3	3	3				3	3
	9. Homebuyer Assistance						3	3		
	10. Support Facilities and Services	3	3	3	3	3	3	3	3	3

2. Second Priority Activities

The City's second priority is to provide: a) assistance to very low-income San Diegans with special needs and those who are homeless, b) support facilities and services to very low-income San Diegans, c) rehabilitation assistance for very low- and low-income homeowners, and d) rental and ownership housing opportunities affordable to low-income families. Table 1B, indicates that nearly 5000 San Diegans are homeless. Though some would argue that this number under-represents this City's homeless population, all agree that they have an acute need for housing assistance which San Diego plans to provide (primarily) through acquisition and rehabilitation of structures suitable for transitional housing, financial assistance to ensure the availability of support facilities and services, and the provision of rental assistance. A similar approach is planned to provide for San Diegans with special needs including battered women, the mentally disabled, and those afflicted with AIDS. In both cases, housing and related assistance are expected to be provided through public and private non-profit entities.

Included as a second priority is the provision of support services (in conjunction with housing assistance) to very low-income San Diegans. The City supports the provision of support services (e.g. job training, education, day care, etc.) to this segment of the population in the belief that a multi-faceted assistance program will promote self sufficiency in the long-term. The City also recognizes the need for housing affordable to low-income San Diegans as a second priority, and an area requiring considerable attention. Despite the fact that many low income San Diegans (earning from 51-80 percent of median income) suffer from the high cost of housing (as seen on Table 1A), these families have more disposable income remaining after covering the cost of housing than do families earning 50 percent or less of median income. It is anticipated that the needs of these families will be primarily addressed through the new construction and acquisition of rental housing, and the rehabilitation of both rental and owner occupied homes.

3. Third Priority Activities

Third priority activities listed in Table 3 include the provision of: a) homeownership opportunities for very low- and moderate-income (up to 95 percent of median) families, b) rental assistance, support facilities and services for low-income San Diegans, c) new construction of housing for (very low-income) homeless individuals and families, and d) housing assistance for homeless San Diegans earning more than 50 percent of median income. Homeownership activities listed in this category reflect the high cost and limited benefit of providing home ownership opportunities to very low-income families in this high cost market and the relative importance of providing public assistance to moderate-income families for whom affordable housing is available through the rental market. Rental assistance and support services for low-income families have been placed in this category reflecting existing federal preferences for assistance and the relative degree to which this segment of the population needs support services compared to those in the very low-income category. The specified homeless assistance activities

listed in this category reflect the current level of support for San Diego's homeless and the high cost of constructing new facilities for this population.

It should be noted that priorities for "elderly households" and "all other households" differ somewhat from households comprised of small and large families. In the case of elderly households, these differences, which include those households earning between 51 and 80 percent of median income, reflect existing federal preferences and the high cost of new construction. In the case of "all other households" (comprised of single, non-elderly households and non-related households), activity rankings are based on existing federal preferences, relative need, and the current supply of housing options available to them.

B. Relevant Public Policies and Development Costs

This section discusses the extent to which the costs or incentives to develop, maintain or improve affordable housing in the jurisdiction are affected by State or local policies, as embodied in statutes, ordinances, regulations or administrative procedures and processes.

There are many factors which have hindered affordable housing efforts here, thereby making San Diego one of the highest cost housing markets in the country. These factors such as high land costs and increased development costs have resulted, in part, from growth and density restrictions. While there may be legitimate reasons in support of such restrictions, benefits resulting from adoption of the policies, on which the restrictions are based, must be weighed against their negative impact on housing affordability.

Policies and other factors which impact the provision of affordable housing are listed below. City efforts to review some of these policies are summarized in the section immediately following this one.

Tax Policies - In 1978, Proposition 13, a referendum to cut property taxes, was adopted in the State of California. According to John M. Levy in an article published in Contemporary Urban Planning, the measure rolled back local property tax assessments to levels of an earlier period, capped the rate at which these assessments could be increased, placed limits on the maximum property tax rate, and barred all units of government, other than counties, from using the property tax. The effect was to cut property tax revenues in California from $12.5 billion to $5.4 billion. As a result, this left substantially less public money to finance infrastructure needed for new development. To compensate for this loss, new infrastructure costs have been passed on to developers who, to the extent possible, pass these additional costs on to consumers in the form of higher prices.

Other tax policies impacting San Diego include the Tax Reform Act of 1986 which reduced incentives for investment in rental properties. Also, this year's federal tax bill authorized only

short-term (6 month) extensions of the mortgage revenue bond program, which provides cut-rate loans to eligible first-time home buyers, and the Low-income Tax Credit program which provides tax credits for investors of low-income rental housing. It is hoped that Congress will adopt a major tax bill in 1992 that will permanently authorize the extension of both of these programs.

Land Use Controls - The length and complexity of San Diego's zoning ordinance tends to add to development costs and processing time. Altogether, San Diego's zoning ordinance includes more than 200 zones, over 20 Planned Districts, and approximately 10 overlay zones. A greater reliance on land use controls and District Plans has resulted in increasing the number of permits requiring discretionary review which, in turn, has lengthened the average processing time for a development project.

Reduction of Allowable Density - San Diego has recently reduced underlying densities in several residential areas in an effort to preserve their single family character. In doing so, the City has removed the opportunity to develop more than an additional 7,000 homes in those communities; many of those homes could have provided affordable housing opportunities. It is recognized that higher density development often plays a critical role in creating affordable housing, particularly in areas with high land costs. In order to provide the maximum number of opportunities for the development of such housing, it is most important to maintain or increase allowable densities in areas of the City where it is appropriate.

Article 34 of the California Constitution - Requires voter approval prior to the construction or acquisition of specified low-income housing projects financed, wholly or in part, with public funds. This requirement adds to the uncertainty associated with the development of affordable housing, and may increase project costs due to resulting delays. The State of California is currently reassessing the impacts of Article 34, and may soon modify those requirements. (The City of San Diego currently has sufficient Article 34 authority to undertake projects totalling more than 3,000 units.)

Companion Unit Ordinance - Several years ago, the City adopted this ordinance, which allows the addition of a small dwelling unit to a parcel zoned for single family residential use. However, restrictions in the ordinance greatly diminish its viability as a source of affordable housing for San Diegans.

Condominium Conversion Ordinance - San Diego has a Condominium Conversion Ordinance that is applicable only to rental units built prior to 1979. Protections with regard to notification of intent and the first-right-to- buy are somewhat stronger than the State's ordinance; however, they are still seen by some as providing only minimal rights. In addition, the ordinance does not provide relocation assistance to eligible tenants who opt to move, unless those tenants are among an identified group of special needs persons.

Demolition of Affordable Housing Units - The City currently restricts the demolition of single room occupancy (SRO) hotels, but does not impose restrictions on the demolition of other dwelling types which provide affordable housing for San Diegans. Since such demolitions are not restricted, the City may be in jeopardy of losing many of these affordable units. Plans are underway to review this issue to determine the advisability of imposing such restrictions.

Multifamily Design Ordinances - The recently approved Multifamily Design Ordinance and the Multifamily Parking Ordinance that preceded it have increased the cost of building multifamily housing by: a) requiring the preservation of existing large trees or their replacement with trees of equal size; b) increasing building set-back requirements; c) establishing "preferred neighborhood character" and "predominant street scale" as criteria for evaluating new development; d) requiring additional discretionary review and generally more stringent development requirements (PRD or PDO) for all but the smallest residential developments; e) prohibiting consolidation of adjacent lots in lower-density multifamily residential zones; f) increasing the number and scale of required building offsets (articulations); g) requiring private outdoor spaces for the majority of units in a development; h) limiting the placement of garage doors on front facades; i) increasing the requirements for storage space; and j) increasing the amount of parking required.

Limitation on Single Family Rentals - In an effort to address negative impacts which some suggest result from non-traditional occupancy patterns in single family rentals, the City has identified the rental of single-family units as a "business" use for which a permit is required. The City has also established Single Family Rental Overlay Zones (SFROZ) with development standards that would discourage or prohibit what are viewed as the worst abuses of the character of that zone. These measures limit shared housing opportunities for low-income people, especially those who, by choice or necessity, constitute non-traditional households.

Regulation of Residential Care Facilities - Zoning regulations of residential care facilities limit the housing choice of handicapped and other disabled people by requiring a conditional use permit for housing serving more than six occupants. Increased affordable housing choices could result from easing CUP requirements.

Growth Limits - Under the City's 1979 Growth Management program, the City aimed to redirect growth away from the peripheral areas of the City and towards the centralized urban areas. Program implementation raised several problems, i.e., there was no mechanism to finance the infrastructure needed to support the higher densities; there were no urban design standards for relating new infill development to existing structures; and zoning was often at odds with density and design recommendations contained in community plans. Recent amendments to the General Plan include direction to develop an Inclusionary Housing Program and an Affordable Housing Preservation Program. Implementation of these programs could lead to an increase supply of housing for lower-income households.

Balanced Communities Policy - The City has had a policy requiring the development of socio-economically balanced communities for some time, but it has never been enforced. Today, with the need for an improved jobs-housing balance, the policy is even more important. This policy should be updated by the Planning Department and Housing Commission and implemented. One way to implement this policy is through an Inclusionary Housing Program. This would create affordable housing opportunities in developing parts of the City for lower-income people who presently have no opportunity to live in many parts of San Diego.

Land Costs - The high cost of land is probably the most important single factor in making San Diego among the least affordable cities for housing in the nation. The cost of vacant, unimproved land in areas suitable for housing can range from $25,000 to $50,000 per unit and even higher, in some areas. It has been suggested that the cost of land has increased as a result of a number of the policies cited herein.

Lack of Available Sites - It has often been the experience of affordable housing developers that suitable sites are not available for purchase. A major portion of the remaining developable land in the City is owned by a relatively small number of entities that intend to utilize this land for future market rate development.

Site Improvements - According to the Building Industry Association of San Diego County, in 1980, land and site improvements (streets, sidewalks, stormwater and sanitary sewers, water lines and other utilities) accounted for 34 percent of the median priced ($109,000) single-family home. By 1990, land and site improvements comprised 36 percent of the cost of the median priced ($206,000) single-family home. Although the percentage share of the cost has remained approximately similar between 1980 and 1990, land and site improvements are responsible for much of the increase in the cost of a single-family house in San Diego during the ten year period, extending from 1980 to 1990.

Development Fees - Fees have come to constitute a rapidly increasing portion of the costs of new residential development in San Diego and, since the passage of Proposition 13, many new fees have been added. It has recently been reported, by the firm of Coopers & Lybrand, that residential development fees range from $11,177 to $16,804 per unit. Because some portion of fees is ultimately passed on to home buyers and renters, fees are a key component of the housing affordability crisis being experienced in San Diego.

Environmental Regulations - The required environmental analyses prepared for proposed discretionary projects can add considerable time and cost to the development process. The cost of development is also increased when prohibitions based on environmental factors result in the development of fewer units than otherwise possible, and when it becomes necessary to provide environmental mitigation required before development is allowed to proceed.

Financing - Traditionally, the major source of lending capital for the housing market has been the Savings and Loan Industry. Following deregulation of that industry in the 1980's, many institutions became highly unstable and began to fail. While the S&L crisis is already making it more difficult for developers to build traditional single-family homes, it is also likely to be felt by those involved in the production of affordable housing for lower-income households (despite the fact that an unanticipated benefit of the S&L bailout legislation has been establishment of an affordable housing program by the lending industry).

Community Plans - Although the City's General Plan and the Community Plans of which it is comprised speak to the need for affordable housing, a variety of housing types and economic levels, and balanced communities, few provide any requirements for incorporating "affordable housing" in the community. Inserting such requirements in Community Plans would be a step toward implementing the City's Balanced Communities Policy and improving the balance of jobs and affordable housing in San Diego.

This subsection discusses critiques of public policy submitted by the public during the last 5 years and the government's response.

On various occasions, members of the public have voiced concern regarding the above-noted policies. Concern has also been expressed regarding obstacles due to NIMBY (Not In My Back Yard) attitudes exhibited within many communities of the City. Concerns have been expressed at City Council and Housing Commission meetings and at other public forums, including the CHAS public forums held on June 5, 1991 and on August 21, 1991. In addition, concern has been expressed over related issues such as poor management of units housing low- income San Diegans, lack of alternative housing initiatives, and the need for non-profit capacity building and technical assistance as noted below:

Poor Management of Units Housing Low-Income Tenants - Due to poor management, many privately owned units in the City have been allowed to deteriorate. Building code violations, area and community blight, and social problems all ensue when housing is not maintained properly. Given the City's growing need for affordable housing, greater emphasis must be placed on the proper management of low- and moderate-income units.

Lack of Alternative Housing Initiatives - Land trusts, limited equity cooperatives, co-housing and shared housing are being implemented in other areas as a means of addressing the need for affordable housing, especially among residents whose demographic profile continues to change from that of the "traditional family unit." Although the City has a significant affordable housing need and has experienced many changes in household characteristics, little has been done here, with the exception of the SRO Program, to encourage utilization of alternative housing concepts.

Need for Non-profit Capacity Building and Technical Assistance - Non-profit housing developers have become a major force nationally in the development of affordable housing,

currently producing as many units as--if not more than--the public sector. In San Diego there is a small, growing nonprofit sector that should soon begin producing more units. However, to ensure their effectiveness, they often require assistance to build their capacity and technical support to meet the tremendous financial, technical, and managerial challenges which affordable housing development entails.

C. Strategies to Remove the Negative Effects of These Policies

This subsection discusses strategies for the removal or amelioration of any negative effects of these policies.

As reported in the previous subsection, a wide range of factors hinder the provision of affordable housing for San Diegans, including land use limitations, tax policies, financing constraints, and several State mandated requirements. Among the factors cited are those which may be modified at the local level to promote affordable housing efforts. The City of San Diego is committed to removing affordable housing barriers, and will modify programs, procedures, and policies to do so.

Local efforts to improve affordable housing prospects respond to the federal call to remove affordable housing barriers strongly voiced in the report by the Advisory Commission on Regulatory Barriers to Affordable Housing, "NOT IN MY BACK YARD" (issued in July, 1991). The need for regulatory relief is so critical to affordable housing efforts that HUD Secretary Jack Kemp has suggested that future levels of federal funding be limited for jurisdictions not actively engaged in removing those locally imposed obstacles.

Several forums are being utilized to identify, examine, and form consensus concerning practical measures to promote affordable housing in San Diego. These forums include: the Housing Trust Fund, the New Zoning Code Update Advisory Committee, the Affordable Housing Conferences, the Inclusionary Housing Task Force, and the Mobile Home Community Issues Committee (which are briefly described below).

Housing Trust Fund - Established in 1990, San Diego's Housing Trust Fund is a pool of locally-controlled revenues for affordable housing. The Fund draws upon two revenue sources: commercial development impact fees, and a portion of the "tourist" tax or TOT (transient occupancy tax). The Fund is expected to collect $7.3 million for its initial fifteen month program plan, adding major resources to local affordable housing efforts for non-profit capacity building, rehabilitation, development, mobile home park acquisition, mobile home coach rehabilitation, first time homeownership, and support services.

New Zoning Code Update Advisory Committee - This group is working with the Planning Department in an effort to update the City's development code process. Its 4-year mission (FY

89 - 92) is threefold: to streamline the regulations so they are user friendly and understandable; to create more predictable timelines for project processing; and to eliminate the redundancies and contradictions so that the right land-use decision is made based on the merit of the project.

Affordable Housing Conferences - San Diego held its second Affordable Housing Conference in March 1991, and anticipates holding conferences every two years. Approximately 400 developers, lenders, policy-makers, and advocates gathered to identify goals and recommendations that address the City's Affordable Housing crisis. Some of the recommendations which came out of the 1991 conference and which are well underway or completed include: establishment of the Inclusionary Housing Task Force, strong local support for renewal of the Federal Low-income Tax Credit, initiation of an extended dialogue with Community Planning Groups concerning affordable housing and how these groups can assist efforts in this area, proposed amendments to the Mobile Home Park Overlay Ordinance which are designed to preserve existing mobile home parks, establishment of a Mobile Home Community Issues Committee to resolve disputes between park owners and renters, and recent Housing Trust Fund support for building non-profit capacity and developing and managing affordable housing.

Inclusionary Housing Task Force - In June 1991, the San Diego Housing Commission established an Inclusionary Housing Task Force to make recommendations concerning the establishment of an inclusionary housing program that is both workable and effective in producing a meaningful number of homes affordable to lower- and median-income San Diegans; the mission of the Task Force requires it to focus attention on potential development offsets which the City may provide in exchange for the production of a designated percentage of affordable housing. Task Force meetings began in September 1991, and it is anticipated that a proposal will be developed by late Spring 1992 for presentation to the Housing Commission and City Council.

Mobile Home Community Issues Committee - This recently appointed committee consists of five members, two mobile homeowners plus an alternate, two mobile home park owners plus an alternate and a fifth person with no vested interest in mobile home parks. It conducts hearings on issues that have not been resolved by mediation and in cases where either party has chosen not to use mediation. In addition, the committee addresses mobile home issues in general.

City and affiliated agency staff will also utilize the Housing Commission, the Planning Commission, and Council Committees as forums for discussion to focus attention on, and create support for, favorable Council action in this area (as detailed in Addendum to Council Report No. 89-00CC which is described below).

Addendum to Council Report No. 89-00CC - In December 1989, the Department of City Planning and the San Diego Housing Commission submitted a memorandum to the City Council

listing a comprehensive series of actions that, if implemented, would complement the City's then proposed Housing Trust Fund. It is anticipated that many of these policies and programs will be presented to City Council for consideration within the term of this CHAS. Among the items that would facilitate affordable housing in the City are: the provision of adequate land and sites for affordable housing; modification of development regulations and permit procedures to facilitate affordable housing; adoption of policies and procedures to preserve existing affordable housing; promotion of State legislation to allow the imposition of anti-speculative fees; and the promotion of increased public understanding and acceptance of the need for affordable housing.

In addition to the above processes and the establishment of the Housing Trust Fund, the City has implemented two important programs which facilitate affordable housing efforts here. These two programs are:

Density Bonus Ordinance - This ordinance provides for a density bonus program whereby a developer can build more units on a parcel than is normally allowed in exchange for setting aside a portion of the resulting dwellings as housing affordable to very low- or low-income families.

SRO New Construction Program - Several years ago, the City added a degree of flexibility to its building code allowing for new development of single room occupancy (SRO) hotels which provide affordable housing for very low-income individuals. As a result, San Diego took a leadership role in a national resurgence of interest in the development of this unique housing type.

Finally, while the above activities and programs are important, more needs to be done. Significant improvement in the City's ability to provide affordable housing will result from Council action to:

- Reduce or defer development impact fees;
- Increase allowable densities in appropriate areas, especially those in non-impacted areas in close proximity to current and future transit nodes;
- Provide incentives for mixed-use development which combines commercial and affordable residential uses in appropriate locations;
- Expedite processing necessary for issuance of building permits;
- Review and, as appropriate, amend the Zoning Code to remove barriers to shared housing opportunities and those barriers limiting housing opportunities for handicapped persons;
- Reduce parking requirements for residential development affordable to low-income San Diegans, especially that which is located close to public transportation; and

- Ensure that enhanced environmental protections are balanced with other public needs such as the need for affordable housing.

Removal of regulatory barriers will be granted only for those who ensure that a percentage of all new residential development (above a specified threshold) will be affordable to lower- and median-income San Diegans. In addition, the City will strive to increase the level of certainty in the approval process for those developing housing for San Diegans.

Many of those measures to promote affordable housing, cited above, require municipal code modifications that may not be forthcoming without lengthy review and debate prior to Council action. In the short term, the City has taken, and will continue to take, interim steps to promote affordable housing including the following:

- Include Housing Affordability Statements in Planning Department and Housing Commission reports to highlight the impact of recommended actions on affordable housing (as is currently being done). The City shall consider requiring this statement in all reports concerning land use, residential occupancy, and development issues with accuracy of impacts confirmed by the Housing Commission or Planning Department.

- Create and fill an Affordable Housing Expeditor position to speed eligible projects through the permit process. It is anticipated that such a position will be proposed as part of the upcoming budget process.

- Inform decision makers, City staff, advisory boards, and members of the public of factual information, issues and events related to affordable housing. The Housing Commission: 1) maintains an open dialogue with Council members and staff, including regularly scheduled topic-specific discussions; 2) conducts bus tours of affordable housing in San Diego for Planning Commissioners, Council members and staff, and other interested parties; and 3) issues regular newsletters and releases concerning affordable housing and related issues. In addition, the Commission will soon begin an extended dialogue on affordable housing with Community Planning Chairpersons.

- Train nonprofit entities, through such programs as those offered by the Local Initiatives Support Corporation (LISC) and the California Housing Partnership, to build their capacity to develop and manage affordable housing for lower-income San Diegans.

- Facilitate utilization of Housing Trust Fund monies to provide affordable housing and build the development capacity of nonprofit entities.

- Train for-profit entities, through such programs as those offered by the San Diego Apartment Association, to build understanding and skills necessary to effectively manage housing for lower-income tenants.

- Encourage partnerships between for profit and nonprofit entities to develop and manage housing affordable to lower-income San Diegans.

- Support reinvestment activities, such as the credit needs analysis scheduled for completion in January 1992, and work to ensure bank compliance with CRA requirements. Banks provide financial products and services in compliance with CRA requirements which meet the credit needs of low-income households, and women and minority owned businesses.

The aforementioned remedies can all be accomplished through action of local government. It is the intent of this City to take action that promotes affordable housing based on recommendations brought forward through those public forums described earlier and other avenues. Public concessions and development incentives shall only be provided, however, in return for the provision of affordable units as certified by the San Diego Housing Commission on behalf of the City. In addition, the City shall direct its legislative lobbyists to communicate its support of legislation, both federal and state, that promotes, and its opposition to such legislation that hinders, the provision of affordable housing.

D. Programs, Services and Initiative Strategies

This section describes the Federal, State, local and private programs and services to be provided, and the special initiatives to be undertaken to implement its five-year strategy.

The City will continue to access public funds available through Federal and State affordable housing programs. Additionally, in an effort to carry out its Five-Year Strategy, San Diego will utilize local funds to support its programs and build on these programs through the development of new initiatives such as Inclusionary Housing. In carrying out its strategy, the City will address the needs of its priority populations: (1) First Priority--very low-income renters; (2) Second Priority--homeless populations, those with special needs, and low-income renters and prospective home buyers; and (3) Third Priority--very low-income and moderate-income households seeking homeownership opportunities.

This subsection describes the Federal, State, local and private programs and services to be provided, and the special initiatives to be undertaken to implement the five-year strategy. In addition, it discusses how the strategy will meet the identified need.

Acquisition/Rehab/New Construction - the City plans to provide housing opportunities affordable to very low- and low-income San Diegans through acquisition, rehabilitation and new construction of rental housing and through the provision of rental assistance. Resources which the City will utilize include: Federal--HOME, CDBG, Public Housing Development, Comprehensive Improvement Assistance Program, and Tax Credits; State--California Housing Rehabilitation Program, Rental Housing Construction Program, Multi-family Housing Bonds,

and Tax Credits; Local--Housing Trust Fund, Redevelopment Set-aside Funds, Density Bonus, and San Diego Housing Commission Local Funds; Private - Foundation, Saving Association Mortgage Company, California Community Reinvestment Corporation.

Rental Assistance - The City plans to provide housing opportunities to, as a first priority, very low-income households experiencing a cost burden of more than 30 percent of their income dedicated to housing and a severe cost burden of more than 50 percent of their household income dedicated to housing, and as a second priority, to low-income households, homeless persons and persons with special needs. Most rental assistance is expected to be provided through the federal Section 8 Program.

Homeownership Opportunities - San Diego is among the most expensive housing markets in the nation, thereby placing homeownership out of the reach of most residents, particularly those who are low-income and very low-income. The City will continue to provide homeownership opportunities to these groups, utilizing various mechanisms including: Mortgage Credit Certificates; funding from the HOME and HOPE programs; resources resulting from issuance of bonds from the State government; Housing Commission local funds; Housing Trust Fund monies from the local government; and Federal Home Loan Bank Affordable Housing Program funds which are provided in conjunction with private lenders. Furthermore, the City will support innovative efforts by nonprofit entities, such as those utilizing community land trusts, limited equity cooperatives, and revolving loan funds, to bring homeownership within the reach of lower-income San Diegans.

Mobile Home Park Preservation - The City now focuses the bulk of its efforts concerning mobile homes on the preservation of existing mobile home parks, and not on the development of additional parks. Current efforts have been focused in this direction because there is no longer land in the City's inventory suitable for mobile home park development, and because additional affordable housing can be provided in a more cost effective manner utilizing other approaches. The City, however, has taken a proactive position to preserve mobile home parks housing lower-income San Diegans through its Housing Trust Fund which provides loans to assist residents to acquire their park and rehabilitate their coaches. In addition, the City is considering amendments to its mobile home overlay zone and has established a Mobile Home Community Issues Committee both of which are described below.

Mobile Home Overlay Zone Ordinance Amendments - The current overlay zone specifically allows a mobile home park owner to close a park without an application for discontinuance or a relocation plan, if the owner is willing to wait an additional three years before pursuing permits or other uses. Under the amendments, an owner must file an application for discontinuance and submit a relocation plan, before obtaining any permit that would allow a change in use for a mobile home park. In addition, whenever a resident or mobile home park owner has reason to believe that 15 percent or more of the total number of mobile home sites in a mobile home park are not being used for a residential purpose, that individual may file a

written statement to that effect with the Planning Director. The Planning Director will subsequently conduct an investigation to be followed by a public hearing to determine if a change in use is taking place. If it is determined that a change in use is underway, the owner will be required to file an application for discontinuance and a relocation plan. These amendments have already been approved by the Housing Commission, the Transportation and Land Use Committee, and the Planning Commission, and are awaiting approval by the City Council and California Coastal Commission.

Mobile Home Community Issues Committee - The committee, established by Housing Authority Resolution, consists of five members: two mobile homeowners plus an alternate, two mobile home park owners plus an alternate and a fifth person with no vested interest in mobile home parks. It conducts hearings on issues that have not been resolved by mediation and on matters where either party has chosen not to use mediation. In addition, the committee will addresses mobile home issues in general.

Elderly, Small Families, and Large Families - Demographics of San Diego show a higher need for affordable housing assistance among the elderly and small families than among large families. In this connection, members of these groups will be accommodated as first and second priorities for acquisition, new construction, rehabilitation, rental assistance and homeownership. People with special needs, such as the elderly and the disabled, will also be given first and second priority for many activities when they fall within the very low-income category. The needs of large families will be addressed primarily through new construction since there is an insufficient supply of larger units available to meet existing needs.

Weatherization - Non-profit groups within the City have been very active with regard to assisting households in making their rental units or homes energy efficient. Towards this end, these groups utilize weatherization programs funded by the U.S. Department of Energy and the U.S. Department of Health and Human Services to assist nearly 1300 households. In addition, they utilize the Department of Health and Human Services' Crisis Intervention Program to assist households in need of emergency funds to pay energy bills.

Overcrowding - The City is attempting to address the issue of overcrowding through the expansion of its affordable housing inventory. To accomplish this, it is tapping sources that allow for new construction, rehabilitation and rental assistance.

Racial/Ethnic Concentrations - The City is attempting to address the issue of racial/ethnic concentrations through programs that promote economic and racial heterogeneity in areas of high concentration. These programs include density bonus, a Section 8 Integrative Housing program which encourages minority participants to utilize their benefits in non-concentrated areas, revision of the City's Balanced Communities Policy, and a proposed Inclusionary Housing program.

Census tracts have been categorized both by their concentration of low-income and minority households to assist in implementing programs consistent with the City's Balanced Communities Policy. Since low-income and minority households each comprise about 40 percent of the City's population, categories have been devised to array census tracts in relation to this central figure. Degrees of low-income or minority concentration have been identified as follows:

00.0 - 20.9% Minimally Concentrated Census Tracts
21.0 - 40.9% Marginally Concentrated Census Tracts
41.0 - 60.9% Concentrated Census Tracts
61+% Highly Concentrated Census Tracts

Homeownership activities, preservation of "at risk" affordable housing, rehabilitation of owner occupied and rental housing, and mixed-income rental housing acquisition and development will occur in all areas exhibiting need (subject to program guidelines). However, it is proposed that the City pursue development or acquisition of multifamily housing, where most units are restricted by occupant income, in areas of low concentration as a first priority, areas of marginal concentration as a second priority, concentrated areas as third priority, and highly concentrated areas only as the lowest priority. It is proposed that the City only sanction development and acquisition of such housing under limited circumstances, such as in cases having strong community support or where there is an overriding need that cannot be satisfied in areas without such concentration.

Involuntary Displacement - The City works to minimize involuntary displacement of residents who are affected by rehabilitation or other development efforts. In this connection it will provide relocation assistance or require delayed rent increases in some instances where existing tenants cannot meet the new rents needed to maintain rehabilitated structures.

At-risk Projects - The City is working to preserve approximately 3600 units of affordable housing that are at risk due to the possible prepayment of subsidized mortgages by private owners. The City's approach is sufficiently flexible to take advantage of available resources and opportunities to significantly extend their term of housing affordability. Under provisions of the National Affordable Housing Act of 1990, current owners of these units can avail themselves of public incentives in exchange for significantly extended affordability restrictions. If current owners do not wish to retain these units as affordable, the City may provide assistance to private non-profit entities interested in purchasing and managing these developments as affordable housing. In the event that no interested and capable private non-profit entity is available to assume control of these at-risk units, the City will, through its Housing Authority or non-profit corporation, pursue ownership and management of those units for which retention as affordable dwellings is considered important in meeting the housing needs of lower-income San Diegans. It is the intent of the City to utilize this flexible approach to retain all, or nearly all, of these units as part of its affordable housing stock.

Improving Public Housing - San Diego has received over $6.5 million in Comprehensive Improvement Assistance Program funds to enhance the quality of life for public housing residents. With these funds, it has been able to renovate over 300 units of public housing. In addition, a portion of the funds has also been used to implement resident services programs at eligible sites. Some of the activities include a Resource Fair, establishment of Just Say No Clubs, an Emergency Alert System for the elderly population, Young Disabled Resident Groups and a Women's Resource Fair.

Homeownership of Public Housing Units - Affordable housing is a particularly precious resource in a City that is ranked among the least affordable in the nation. If that affordability is guaranteed over the long term, as is the case with public housing, its value as part of this City's affordable housing stock is magnified. There are currently fewer than 1100 public housing units within the City of San Diego; a City this size could be expected to have five to eight times this number. San Diego recognizes the valuable role that its public housing can play in meeting a part of its affordable housing needs. Therefore, the City is not involved in activities to promote ownership of public housing units by residents. Consistent with its CHAS, the City of San Diego will work to promote ownership opportunities among lower- and moderate-income first-time home buyers some of whom may, in fact, be public housing residents. If a family currently residing in public housing participates in a program enabling them to purchase a home, their public housing unit, once vacated, will serve to meet the needs of other eligible San Diegans.

E. Supportive Housing for Homeless Persons

This subsection discusses: the needs of the various populations for emergency shelter and services; housing and services for transition to permanent housing; independent living and housing and supportive services for those not capable of achieving independent living; and low-income families and individuals in imminent danger of residing in shelters.

As discussed in Part 2, there are approximately 1435 bed spaces available for homeless individuals and families. Shelters for homeless individuals and families range from a bed for the night to highly structured transitional programs which combine housing with support services. These programs are arranged into three categories of: (1) Emergency shelters, (2) Transitional Shelters, and (3) Shelters Serving Special Populations. In addition a variety of support services are provided. Some include housing assistance for disabled homeless persons who are given help in locating permanent and suitable affordable housing; a Homeless Information Line that helps homeless persons locate services and shelters; an Interagency Bulletin Board which allows homeless service providers to share information about services electronically; Legal Aid for persons in need of civil or criminal assistance; a food bank which distributes groceries to eligible clients; a day care center which homeless persons can access during the day in order to shower, change clothes and do laundry.

In addition, the City has several programs designed to help homeless persons make the transition from temporary to permanent housing. Under a program which assists dually-diagnosed homeless persons, participants are required to set a portion of their income aside in a "forced" savings plan so as to offset first/last month's rental expenses when they complete their stay. Other transitional housing programs also offer residents the services and counseling they need to facilitate independent living. Finally, the City is attempting to help low-income persons who are in imminent danger of becoming homeless through rental assistance, through the development of an emergency mortgage payment program and the creation of new affordable housing units.

All the foregoing activities are being provided through various funding mechanisms including the Federal McKinney Program, the State's Transitional Housing Program, Foundation contributions, the Housing Trust Fund, Housing Commission local funds, and Rental Assistance. It is anticipated, as shown on Table 4/5A, that the City and its nonprofits will maintain and, hopefully, increase the level of services and assistance provided through these programs during the next five years. In particular, the City is hopeful that it and nonprofits will be able to access the new activities under the McKinney Programs that are designed to assist persons with special needs. These programs are important in that they will supplement local funds which are being used to help the disabled, elderly and AIDS victims obtain affordable housing opportunities which contain a supportive component.

F. Institutional Structure

This subsection identifies the institutional structure through which the City will carry out the affordable housing strategy.

The City expects to carry out much of its strategy through public and private partnerships which it seeks to encourage. Thus far, these partnerships have been very instrumental in the effort to meet the wide range of homeless and affordable housing needs in the City. In the future, to whatever extent feasible, the public sector will continue to match or augment private sources of funding from non-profits seeking to create affordable housing opportunities. In addition, through the density bonus program and other mechanisms, it will pursue mixed-income projects with private for-profit developers. It will also assist non-profits in the area of capacity building so that those nonprofits are able to gain the technical expertise needed to develop and manage affordable housing.

1. Public Sector

City-County Reinvestment Task Force - The Task Force, funded by the City's Housing Commission and the County of San Diego, is involved in encouraging financial institutions to invest in housing and businesses located in low-income and minority neighborhoods. This is

accomplished largely through an oversight function performed under provisions of the federal Community Reinvestment Act.

Regional Task Force on the Homeless - The Task Force is involved in such activities as: facilitating communication among service providers, public education, fund raising, and disseminating information.

San Diego Housing Commission - The San Diego Housing Commission, established in 1979 by the San Diego City Council, is the City's Housing Authority. Since its inception, the Commission's efforts have resulted in nearly 19,000 affordable housing units throughout the City. While the Commission operates as a separate public entity in administering its program, its budget and programs are reviewed by the City Council sitting as the Housing Authority. The Commission's currently approved budget is approximately $83 million, and the Commission has a staff of approximately 240 employees. Its mission is to provide quality, affordable housing for the City's elderly, disabled and low-income families through: the acquisition, rehabilitation, and development of such housing; its management; and the provision of rental assistance and housing-related services.

City of San Diego Community Services Program - The Community Services Program Office administers the City's $10 million Community Development Block Grant Program as well as Emergency Shelter Grant funds available through the McKinney Program. Through these programs, the City makes direct allocations to local nonprofit organizations involved in housing and support service activities. Also, Community Development Block Grant funds are allocated to the Housing Commission for the development and rehabilitation of housing for lower-income San Diegans.

City of San Diego Planning Department - The Planning Department is responsible for development of the State mandated Housing Element and for the overall administration of many development regulations. Planning Department staff present policy recommendations to the Planning Commission, which acts in an advisory capacity to the City Council.

City of San Diego Redevelopment Agency - California Redevelopment Law requires localities to set aside 20 percent of their tax increment dollars derived from redevelopment project areas to improve the supply of housing for very low-, low-, and moderate-income households. San Diego currently has eleven redevelopment project areas. These are administered by the Centre City Development Corporation, the Southeast Development Corporation, and the Economic Development Division of the City's Property Department. As of July 1990, three of San Diego's eleven redevelopment areas had generated a total of 688 very low-, low-, and moderate-income units. In addition, the Redevelopment Agency currently has approximately $4 million dollars in set-aside funds available. It plans to expend $3 million of that during the upcoming Fiscal Year in a variety of affordable housing activities including: acquisition, rehabilitation, new construction and planning grants.

County of San Diego - The County of San Diego has several agencies and departments that have responsibility for the provision of social services for qualifying households. Among these agencies and departments are: the Adult Services Division, the Department of Health Services, Mental Health Services, the Agency on Aging, the Department of Social Services, and the Office of Veterans' Services. These agencies and departments assist eligible individuals and families with services ranging from medical insurance to food stamps. In addition, the County's Department of Housing and Community Development is responsible for providing housing assistance to qualifying households living outside the City of San Diego, but within San Diego County boundaries. The City and County of San Diego often work cooperatively to provide those eligible, and living within the City, the full range of services to which they are entitled.

San Diego Association of Governments (SANDAG) - SANDAG plays a role in assisting local governments, including the City of San Diego, in preparing planning documents, especially the Housing Elements required by State law for each city. SANDAG also functions as an important clearing house for housing development information and training center for legal requirements of housing development and related affordable housing programs.

2. Non-Profit Sector

The non-profit sector in San Diego is evolving. For instance, there are some long standing institutions here which have a proven record for developing housing and/or implementing social service activities. In addition, there are newer ones which are in the process of building their capacity to meet the needs of their specific clientele. What all these groups share however is a commitment to work independently, collectively, and with the private and public sectors to address the affordable housing and supportive service needs of the poor and homeless in San Diego.

A list of non-profits engaged in affordable housing or related activities is included in Addendum 3. The list includes several organizations that are providing support to non-profits with access to important information, technical assistance, and funds for capacity building. These organizations include:

Nonprofit Federation for Housing and Community Development - is a group of non-profits which have come together to address social service and low-income housing concerns through the sharing of resources.

Housing Support Collaborative - is comprised of local government groups and other support organizations to provide money and technical assistance to non-profits.

California Housing Partnership - was created by the California Legislature to preserve affordable housing for low-income households through the provision of technical assistance, training, and information.

Local Initiatives Support Corporation (LISC) - is a national organization which channels private-sector money to non-profit community development corporations to build or rehabilitate affordable housing. In September 1991, LISC began a one-year training program offering selected non-profit organizations the technical skills to undertake a low-income housing project from the pre-development stage through to the design of a management plan. By the end of the one-year period, it is anticipated that approximately five (5)projects will be financed and ready for construction.

Resident Relations Foundation - is a non-profit organization which provides landlord and tenant services throughout the City and County of San Diego. Assistance is offered by the Foundation in the following areas: (1) mediation of landlord/tenant disputes; (2) counseling by trained individuals on behalf of parties involved in landlord/tenant disputes; (3) the availability of a pre-recorded taped education program entitled RentSense; (4) the availability of a general information handbook for landlords and tenants; and (5) the availability of a security deposit protection kit booklet.

San Diego Community Foundation - provides grants to charitable and non-profit housing development organizations for pre-development costs, staffing and capacity building, as well as the provision of services to the community.

San Diego Home Loan Counseling Service (SDHLCS) - is a not-for-profit organization funded as a service to the community by various lending institutions in San Diego County. The organization provides free home loan counseling and related services to anyone interested in homeownership. Special attention is given to low-income households.

United Way of San Diego County - is the local affiliate of a national organization which provides financial and technical support to non-profit organizations which deliver ancillary services to segments of the community most in need.

3. Private Sector

San Diego Apartment Association - is a professional association which represents members who, together, own or manage more than 150,000 units within San Diego County. Since much of San Diego's affordable housing stock is comprised of rental housing, the Apartment Association can impact the quality of housing available to, and management services received by, lower income families.

Association of Realtors - is an organization with a substantial number of members who practice real estate in the cities of San Diego, Poway, and Lemon Grove. The Association also has numerous affiliate members in the financial, appraisal, and legal professions. Its bylaws contain several goals and objectives of the organization. One of the Association's highest priorities is

the preservation and protection of private property rights. Other goals include the promotion of homeownership and rental housing opportunities for all San Diegans.

Building Industry Association (BIA) - is a 52 year old national organization which has several purposes, one of which is to serve as an advocate for affordable housing. The BIA contends that San Diegans can have affordable homes if the City removes regulatory and political barriers which prevent the industry from building an adequate supply of housing. Demonstrating its support of affordable housing, the BIA teamed up with the County and the San Diego Housing Commission in October 1991 for a one-day conference on affordable housing. A wide representation of housing officials, builders, lenders and housing advocates attended. Participants were provided information on affordable housing legislation and financing techniques, and they were given firsthand accounts of affordable housing success stories throughout the State.

California Community Reinvestment Corporation (CCRC) - pools funds from California banks to provide permanent long term financing for affordable low-income housing projects.

Federal Home Loan Mortgage Corporation - has committed to purchasing $100 million in low-income loans from local lenders. This will enable lenders to sell their loans to generate funds for additional lending.

The Savings Association Mortgage Company (SAMCO) - pools funds from its 45 savings and loan institutions, and provides financing for low-income housing. SAMCO is able to finance difficult, innovative, and untried housing projects.

G. Assessment of Institutional Structure

The City of San Diego has a good institutional structure in place for execution of its five year strategy. It has the involvement and support of the public, non-profit, and private sectors which, in many cases, are forming partnerships to produce affordable housing. There are, however, gaps in the structure which, if improved, would enhance the City's ability to provide affordable housing and related services. For example, many of the local non-profits are new (or newly involved with housing) and in need of technical assistance and support to build capacity. Significant steps have been taken to provide this assistance beginning with offering introductory housing development workshops for non-profit entities; funding in support of these workshops was provided by the County of San Diego's Housing and Community Development Department and the City's Housing Commission. In addition, non-profits' access to support services was increased with the recent opening of local offices by the Local Initiatives Support Corporation (LISC) and the California Housing Partnership, and with the staff addition by the Community Foundation. Also, the Housing Trust Fund recently awarded approximately $190,000 to non-profits for capacity building activities. However, even with this support, it will take several

years for local non-profit capacity to equal that of non-profits in many other areas of the State and nation; yet, progress in this area is expected to be apparent much sooner.

The institutional structure of the past was comprised almost solely of public entities that would have been hard pressed to implement a multifaceted housing strategy alone. However, today's institutional structure involves many entities representing the public, private, and non-profit sectors that have joined together to achieve the goals embodied in this City's CHAS. This diversity blends to create a strong institutional structure well able to carry out San Diego's five year housing strategy.

H. Geographic Targeting

In general, assisted housing activities are expected to take place throughout San Diego in compliance with the City's Balanced Communities Policy. It is anticipated, however, that there will be some notable exceptions. Most emergency shelter facilities and related homeless support services are expected to remain in the downtown and contiguous areas. Although participants in the Section 8 Rental Assistance Program are encouraged (through the provision of information and incentives) to lease housing in areas of the City that have not traditionally provided housing for program participants, experience suggests that most Section 8 families will continue to live in Mid-City, San Ysidro, and Southeast San Diego. Federal regulations currently preclude efforts beyond the use of incentives to encourage selection of housing location of Section 8 program participants. Clearly, a major portion of rehabilitation activity is expected to take place in the older sections of the City. Publicly assisted rehabilitation activity will concentrate on housing in the older sections of San Diego, and is not expected to occur in the newer sections located in the northern portions of the City. And finally, the City will continue its efforts to locate housing in which all units are restricted by income, such as public housing, in those parts of San Diego not already experiencing a high concentration of low-income households. For instance, it is not anticipated that additional public housing will be built or acquired in San Ysidro during the period of this CHAS in recognition of its demographics and the fact that this area is already home to a significant number of current public housing residents.

I. Coordination of Resources

Although available resources are not sufficient to meet the affordable housing needs of all San Diegans, the City expects to utilize federal, state, and local revenue to provide significant affordable housing opportunities for many very low-income families who are often those in the greatest need of housing. When possible, public funds will be used to leverage private resources available from conventional lenders. In addition, the City intends to utilize land use incentives (such as density bonuses) and inclusionary housing requirements to increase the amount of affordable housing that results from the expenditure of public funds in this area.

Public monies to support affordable housing activities within the City of San Diego are received either as an entitlement (i.e. a sum to which the jurisdiction is entitled often based on formula allocation) or on the basis of competition with other entities. Furthermore, these public dollars are, in some cases, received by the City itself or, as is often the case, received by other entities within the City of San Diego. The City and Housing Authority plan to receive the following federal resources as entitlements during FFY 92 in support of the City's affordable housing activities:

HOME FUNDS

COMMUNITY DEVELOPMENT BLOCK GRANT

RENTAL REHABILITATION FUNDS

EMERGENCY SHELTER GRANT

FEDERAL EMERGENCY MANAGEMENT ASSISTANCE FUNDS

PUBLIC HOUSING COMPREHENSIVE GRANT

In addition to the entitlements listed above, the City anticipates that the following federal resources will be available during FFY 92 in support of affordable housing activities implemented by other entities within the jurisdiction:

HOPE II AND III

SECTION 202 ELDERLY

SECTION 811 HANDICAPPED

SECTION 8 RENTAL CERTIFICATES AND VOUCHERS

SECTION 8 MODERATE REHABILITATION FOR SROS

PERMANENT HOUSING FOR THE HANDICAPPED

TRANSITIONAL HOUSING

PUBLIC HOUSING DEVELOPMENT

PUBLIC HOUSING COMPREHENSIVE ASSISTANCE IMPROVEMENT PROGRAM

DRUG ELIMINATION PROGRAM

The City anticipates that the following state resources will be available in FFY 92 in support of affordable housing activities implemented by other entities within the jurisdiction:

CALIFORNIA HOUSING REHABILITATION PROGRAM

RENTAL HOUSING CONSTRUCTION PROGRAM

EMERGENCY SHELTER PROGRAM

ENERGY CONSERVATION PROGRAMS

The City anticipates that the following local resources will be available in FFY 92 in support of affordable housing activities implemented by other entities within the jurisdiction:

REDEVELOPMENT AGENCY LOW-INCOME SET-ASIDE FUNDS

HOUSING COMMISSION LOCAL FUNDS

HOUSING TRUST FUND

The City anticipates that the following private support of affordable housing activities will be available within the jurisdiction for use in FFY 92:

FOUNDATION GRANTS

AFFORDABLE HOUSING PROGRAM (FIRREA)

SECTION 203k INSURED LOANS

MORTGAGE CREDIT CERTIFICATE ASSISTED LOANS

SAVINGS ASSOCIATION MORTGAGE COMPANY (SAMCO) LOANS

CALIFORNIA COMMUNITY REINVESTMENT CORPORATION (CCRC) LOANS

CALIFORNIA HOUSING FINANCE AGENCY (CHFA) LOANS

CONVENTIONAL LOANS FROM LENDING INSTITUTIONS

J. Consistency of State and Local Housing Strategies

Affordable housing strategies incorporated in the City of San Diego's CHAS are consistent with those incorporated in the City's Housing Element of the General Plan, a document which is mandated and approved by the State. San Diego is currently updating its Housing Element, with State approval expected by year end. In addition, the City of San Diego has been in contact with the State Department of Housing and Community Development's Division of Housing Policy Development which is responsible for the State's CHAS. On July 22, 1991, Housing Commission staff represented the City at a meeting with the State Department of Housing and Community Development (HCD) to ensure sufficient coordination of the respective housing strategies, and subsequently provided HCD with a copy of the City's August 7, 1991 draft CHAS. Also, a copy of the December 9, 1991 City Council approved CHAS was submitted to HCD, simultaneously with the City's submission of the document to HUD. On February 28, 1992, HUD approved the City's CHAS. A copy of the approved document will be forwarded to HCD for its files.

PART 4. ANTICIPATED RESOURCES & PLAN FOR INVESTMENT

Part 4 describes the resources that the City of San Diego reasonably expects will be available for the coming Federal fiscal year that will be used to address the needs and conditions described in Parts 1 and 2.

Table 4/5A, pages 80 to 84, lists all federal, state, and local resources anticipated to be available to support affordable housing activities within the City of San Diego, and all funds which are expected to be committed for that purpose between October 1, 1991 and September 30, 1992. In addition, available dollars are allocated in the Table among the following activities: rehabilitation, acquisition, tenant assistance, new construction, home buyer assistance, planning grants, support services, and operating costs. Consistent with the affordable housing strategy discussed in Section III, Table 4/5A indicates a funding pattern which supports an array of housing activities. The City of San Diego's Affordable Housing Plan includes a substantial investment in rehabilitation, acquisition, new construction, and home buyer assistance, along with a smaller investment in additional tenant assistance, the provision of support services, and planning grants. It is anticipated that more than $85 million will be invested to provide additional affordable housing assistance to eligible San Diegans during FFY 92. When additional support to continue existing assistance is included, more than $100 million will be invested to provide decent and affordable housing for San Diegans. An investment of this amount clearly provides more than affordable housing opportunities; it has a ripple effect that benefits this City's overall economy.

A. Local Utilization of CDBG Funds

During the last several years, State and local funds have played an increasingly important role in the provision of affordable housing. However, federal funding has traditionally played a primary role in the provision of affordable housing and, with the passage of the National Affordable Housing Act of 1990, the federal government seeks to re-assert its leadership role in this important area. Through the Affordable Housing Act, the new HOME and Hope Programs join the established public housing, rental assistance, and CDBG programs to create new housing opportunities for low-income families in San Diego and across the nation. Affordable housing efforts in San Diego have traditionally relied heavily on rental assistance (8,000+ families currently served), public housing (1,000+ families currently served), and housing rehabilitation activities (4,900+ owner occupied and rental units rehabilitated). The City Housing Authority regularly submits applications to HUD seeking additional support for public housing and rental assistance programs. In addition, the City annually receives an entitlement of CDBG funds from HUD, and allocates those funds among several low- and moderate-income activities including housing. In recent years, San Diego has dedicated about 20 percent of its annual CDBG allocation to support affordable housing activities (primarily implemented by the Housing Commission). Most recently, the Housing Commission received

CHAS Table 4/5A

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

Anticipated Resources & Plan for Investment

Comprehensive Housing Affordability Strategy (CHAS)

Name of Jurisdiction(s) or Consortium: The City of San Diego

FY: 92

Funding Source Federal Funds Awarded or to be Awarded to Jurisdiction	Anticipate to be Available (A)	Expect to Commit (B)	Anticipated resources expected to be committed to projects/activities during FY ($000's)							
			Rehabilitation (C)	Acquisition (D)	Tenant Assistance (E)	New Construction (F)	Home Buyer Assistance (G)	Planning Grants (H)	Support Services (I)	Operating Costs (J)
1. Home	7,200	1,500	500	400	100	250	250			
2. Hope 1: Homeownership of Public Housing Units	0	0	0	0	0		0	0	0	
3. Hope 2: Homeownership of Multi-family Units	0	0	0	0	0		0	0	0	
4. Hope 3: Homeownership of Single Family Units	0	0	0	0			0	0	0	
5. CDBG*	1,300	1,300	1,300	0	0	0	0		0	
6. DOE/Other Energy Prg.	0	0	0			0				0
7. Other: Rental Rehab	900	700	700	0	0	0	0	0	0	0
8. Rental Rehab Program Income	220	220	0	0	220	0	0	0	0	0
9. Subtotal – Housing	9,620	3,720	2,500	400	320	250	250	0	0	0
10. CDBG (Homeless)		0	0	0	0	0	0		0	
11. ESG	260	260	0		0				260	0
12. Perm. Housing for Handicapped	0	0	0	0		0			0	0
13. Transitional Housing	0	0	0	0		0			0	0
14. Shelter Plus Care	1,830	300			300					
15. Other	500	500	0	0	0	0	0	0	500	0
(Specify) FEMA	0	0	0	0	0	0	0	0	0	0
16.	0	0	0	0	0	0	0	0	0	0
17.	0	0	0	0	0	0	0	0	0	0
18. Subtotal – Homeless	2,590	1,060	0	0	300	0	0	0	760	0
19. Total to Jurisdiction	12,210	4,780	2,500	400	620	250	250	0	760	0

* An Additional $900,000 is allocated to new program development, policy development and analysis and other related activities.

Funding Source Federal Funds Awarded or to be Awarded to Other Entities	Anticipate to be Available (A)	Expect to Commit (B)	Anticipated resources expected to be committed to projects/activities during FY ($000's)							
			Rehabilitation (C)	Acquisition (D)	Tenant Assistance (E)	New Construction (F)	Home Buyer Assistance (G)	Planning Grants (H)	Support Services (I)	Operating Costs (J)
20. Hope 1: Homeownership of Public Housing Units	0	0	0	0	0		0	0	0	
21. Hope 2: Homeownership of Multi-family Units	200	200	0	0	0		0	200	0	
22. Hope 3: Homeownership of Single Family Units	1,700	1,360	60	1,000				100	200	
23. Section 202 Elderly	2,600	600	0	0	0	600			0	
24. Section 811 Handicapped	1,300	400	0	0	0	400				
25. Rental Certification	1,200	1,200			1,200			0		
26. Rental Vouchers	1,800	1,800			1,800			0		
27. Mod Rehab SROs Proj.	144	144			144					
28. Permanent Housing for Handicapped	400	400	0	400		0		0	0	0
29. Transitional Housing	1,000	600	0			0			600	0
30. LIHTC	270	270	0	0	0	270	0	0	0	
31. Public Housing MROP	0	0	0							
32. Public Housing Develop.	15,000	12,000	0	10,000		2,000	0	0		
33. Public Housing CIAP	1,200	1,200	1,080	0				120		
34. Public Housing Comprehensive Grant Program	1,100	500	500	0	0	0	0			
35. FmHA	0	0	0	0	0	0	0			
36. Other (Specify)	0	0	0	0	0	0	0	0	0	0
37.	0	0	0	0	0	0	0	0	0	0
38.	0	0	0	0	0	0	0	0	0	0
39. Total – Other Entities	27,914	20,674	1,640	11,400	3,144	3,270	0	420	800	0
40. Total – Federal	40,124	25,454	4,140	11,800	3,764	3,520	250	420	1,560	0

Funding Source Non–Federal Funds	Anticipate to be Available (A)	Expect to Commit (B)	Anticipated resources expected to be committed to projects/activities during FY ($000's) Rehabilitation (C)	Acquisition (D)	Tenant Assistance (E)	New Construction (F)	Home Buyer Assistance (G)	Planning Grants (H)	Support Services (I)	Operating Costs (J)
State Funds (Specify)										
41. See Attachment I	0	0	0	0	0	0	0	0	0	0
42.	0	0	0	0	0	0	0	0	0	0
43.	0	0	0	0	0	0	0	0	0	0
44.	0	0	0	0	0	0	0	0	0	0
45. Subtotal – State Funds	8,688	8,688	5,918	250	0	2,520	0	0	0	0
Local Funds (Specify)										
46. Redevelopment Set–aside	4,000	3,000	750	1,000	0	1,000	0	250	0	0
47. Housing Trust Fund	7,300	7,000	2,250	0	0	2,250	700	800	1,000	0
48. Housing Commission	5,000	4,500	900	1,550	400	1,000	350	0	300	0
49.	0	0	0	0	0	0	0	0	0	0
50. Subtotal – Local Funds	16,300	14,500	3,900	2,550	400	4,250	1,050	1,050	1,300	
Private Funds (Specify)										
51. See Attachment I	0	0	0	0	0	0	0	0	0	0
52.	0	0	0	0	0	0	0	0	0	0
53.	0	0	0	0	0	0	0	0	0	0
54.	0	0	0	0	0	0	0	0	0	0
55. Subtotal – Private Funds	23,360	21,360	4,300	800	0	0	15,900	360	0	0
56. Total – Non–Federal Funds	48,348	44,548	14,118	3,600	400	6,770	16,950	1,410	1,300	0
57. Grand Total All Funds	88,472	70,002	18,258	15,400	4,164	10,290	17,200	1,830	2,860	0

TABLE 4/5A ATTACHMENT I

Funding Source Non–Federal Funds	Anticipate to be Available (A)	Expect to Commit (B)	Anticipated resources expected to be committed to projects/activities during FY ($000's)							
			Rehabilitation (C)	Acquisition (D)	Tenant Assistance (E)	New Construction (F)	Home Buyer Assistance (G)	Planning Grants (H)	Support Services (I)	Operating Costs (J)
State Funds (Specify)										
41. CA Housning Rehab Program	5,250	5,250	5,250	0	0	0	0	0	0	0
42. CA Rental Housing Const. Program	2,400	2,400	0	0	0	2,400	0	0	0	0
43. LIHTC	120	120	0	0	0	120	0	0	0	0
44. Emergency Shelter Program	168	168	168	0	0	0	0	0	0	0
45. Energy Conservation Weatherization	500	500	500	0	0	0	0	0	0	0
46. Mobilehome Park Ownership Program	250	250	0	250	0	0	0	0	0	0
47.	0	0	0	0	0	0	0	0	0	0
48.	0	0	0	0	0	0	0	0	0	0
49.	0	0	0	0	0	0	0	0	0	0
50. Subtotal – State Funds	8,688	8,688	5,918	250	0	2,520	0	0	0	0
Private Funds (Specify)										
51. Foundation	360	360	0	0	0	0	0	360	0	0
52. Affordable Housing Program FIERREA	1,200	1,200	0	0	0	0	1,200	0	0	0
53. 203K Insured Loans	1,000	1,000	200	800	0	0	0	0	0	0
54. Mortgage Credit Certificates	12,000	10,000	0	0	0	0	10,000	0	0	0
55. Conventional Loans	8,800	8,800	4,100	0	0	0	4,700	0	0	0
56. Subtotal – Private	23,360	21,360	4,300	800	0	0	15,900	360	0	0
57.	0	0	0	0	0	0	0	0	0	0

$2.2 million of CDBG funds in support of its housing activities. The $1.3 million of CDBG funds allocated to the Commission depicted in Table 4/5A reflects only those funds supporting direct housing (rehabilitation) activities; the remaining $900,000 is utilized in support of new program development, policy analysis and development, and other non-direct activities. The remaining portion of the City's annual CDBG allocation has been used to finance construction, acquisition, and renovation of support facilities, provision of support services, and repair of infrastructure; activities supported by CDBG funds are largely targeted in older sections of the City in which most very low- and low-income San Diegans reside. These activities are viewed as important in providing an integrated approach to meeting the needs of very low- and low-income families.

B. Full Participation in the Provision of Affordable Housing

The City's strategy and investment plan both rely on public, private, and non-profit entities to provide affordable housing. The public sector has been involved through administration of the public housing and rental assistance programs, participation in public-private partnerships, building capacity of non-profits, review of public policies affecting affordable housing, and advocacy for those programs and policies. Non-profits are now engaged in a vigorous capacity building program which will enable them to transform their concern and commitment into the production and management of affordable housing for low-income families. In general, the private sector will remain involved in affordable housing activities to the extent that their participation makes good business sense or is required by statute or regulation. Incentives for private participation include local land use programs such as density bonuses and the availability of favorable financing; requirements for such participation in affordable housing activities include inclusionary housing standards and Community Reinvestment Act regulations. The City is confident that the aforementioned entities will act, together and independently, to successfully engage all available resources to provide affordable housing for San Diegans.

C. Matching Federal Resources with Non-Federal Contributions

The National Affordable Housing Act of 1990 requires matching local contributions under two new federal housing programs, HOPE and HOME. The matching requirements will be effective under HOPE beginning in FFY 1992. Matching requirements for HOME are expected to be effective beginning with the FFY 93 allocations. The local matching requirements for these programs are noted below:

HOPE MATCHING FUND REQUIREMENT

ACQUISITION OF:	HOPE	NON-FEDERAL
Public Housing (Hope I)	$4 (for each)	$1
Multi-family Hsg. (Hope II)	$3 (for each)	$1
Single-family Hsg. (Hope III)	$3 (for each)	$1

HOME MATCHING FUND REQUIREMENT

ACTIVITY	HOME	NON-FEDERAL
Rehabilitation	$4 (for each)	$1
Substantial Rehab	$3 (for each)	$1
New Construction	$2 (for each)	$1
Rental Assistance	$4 (for each)	$1

The City of San Diego is confident that it will be able to meet matching fund requirements under HOPE and HOME through a combination of local and state monies which have been dedicated to affordable housing. The San Diego Housing Trust Fund alone is expected to commit $7 million to specific affordable housing activities during FFY 92. It is anticipated that only a small portion of that amount would be needed to meet any matching requirements under HOPE in FFY 92. As can be seen in Table 4/5A, the City plans to have access to local and state funds, in addition to Housing Trust Fund monies, which may also be used to provide matching dollars for projects when required.

D. Leveraging Funds to Promote Cost Effective Production

Large amounts of public funds and other assistance are needed to meet the affordable housing needs of San Diegans. This assistance is needed because very low-, low-, and moderate-income families cannot afford to pay the rent or mortgage payments necessary to cover the cost of constructing and operating a typical apartment or owning a home in San Diego. As seen in Table 1A, this "affordability gap", which must be met in order to provide affordable housing

opportunities, ranges from about $30,000 to $60,000 for low- and very low-income families respectively.

It is clear that many, if not most, affordable housing projects will utilize assistance from more than one public source in order to bridge the significant affordability gap which exists in this high cost area. Table 4/5A lists many revenue sources, in addition to federal funds, expected to be available to support affordable housing activities. The City of San Diego, largely through efforts of its Housing Commission, has put forth considerable energy to ensure that technical assistance is available for prospective affordable housing providers who need such assistance to secure funds from these multiple sources in order to make their projects feasible. Local offices of LISC, California Housing Partnership, and the Community Foundation now also provide technical assistance in this area.

PART 5. IMPLEMENTATION

Part 5 describes the jurisdiction's specific action plans and goals for the coming year toward carrying out the five-year strategy described in Part 3. It translates the jurisdiction's five-year strategy and anticipated resources into a one-year action plan and goals which will guide the jurisdiction's resource allocation and investment decisions during the coming year.

Table 5B[1], page 88, lists goals for families to be assisted, wholly or in part, with HUD funds. Table 5B[2], page 89, lists goals for families to be assisted without HUD funds. Both tables list goals (number of households assisted) by family income group and tenure (renter or homeowner), and by housing activity type (e.g. new construction, rental assistance, etc.); homeless assistance goals are included in the Homeless Action Plan discussed below. Although affordable units are often provided as part of mixed-income multi-family projects which also include market rate units, goals (and resources listed in Table 4/5A) reflect only affordable units anticipated during FFY 92. Jurisdictions are instructed to include all families assisted by each activity type, even if doing so results in double counting. Jurisdictions are to correct for any double counting when listing goal subtotals by income group (lines 1 and 7 of Tables 5B[1] and 5B[2]); thus, the total goal (line 15 of the same Tables) should not count families more than once, even if assisted through two or more housing activities. Families are to be recorded as "assisted" as of the beginning of each activity. Therefore, residents of a rehabilitated property, for example, will be considered as having received assistance at the start of rehabilitation, instead of at completion as has been the custom in the City of San Diego. And finally, Column A in Tables 5B[1] and 5B[2] calls for "Total Section 215 Goals". Families meeting Section 215 goals are those residing in units where housing costs are restricted to amounts not more than 30 percent of 65 percent of median income, adjusted for family size (a monthly rent of $629, plus utilities, for a family of four residing in a two bedroom apartment in 1991).

A. The Provision of Housing Assistance

Housing assistance is generally provided for San Diegans through one or more of the following program activities:

1. New Construction

100 Percent Affordable - this typically involves new public housing development and multi-family housing developed utilizing multiple subsidies including low-income tax credits and local assistance.

Less than 100 Percent Affordable - this typically involves housing developed by the private sector utilizing public assistance along with (a) conventional loan(s) in exchange for an agreement to impose occupancy and rent restrictions on a portion (usually 20 percent) of units

CHAS Table 5B [1]

Goals for Families to be Assisted with Housing (with HUD funds)

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

Comprehensive Housing Affordability Strategy (CHAS)

Name of Jurisdiction(s) or Consortium:

The City of San Diego

FY: 92

Assistance Provided by Income Group With HUD Assistance	Total Section 215 Goals (A)	Total Goals (B)	Renters: Elderly 1 & 2 Member Households (C)	Renters: Small Related (2 to 4) (D)	Renters: Large Related (5 or more) (E)	Renters: All Other Households (F)	Renters: Total Renters (G)	Owners: Existing Homeowners (H)	Owners: First Time Homebuyers With Children (I)	Owners: First Time Homebuyers All Others (J)	Owners: Total Homeowners
1. Very Low-Income (0 to 50% MFI)*	2,100	2,100	440	860	390	380	2,070	30			30
2. Mod Rehab & Acquisition	1,470	1,470	288	648	216	288	1,440	30			30
3. New Const. Sub Rehab, Related Infrastructure	210	210	60	10	110	30	210				
4. Rental Assistance	480	480	96	288	72	24	480				
5. Homebuyer Assistance	12	12							6	6	12
6. Support Services		720	144	324	108	144	720				
7. Other Low-Income (51% to 80% of MFI)*	430	430	72	216	54	18	360	60	10		70
8. Mod Rehab & Acquisition	430	430	72	216	54	18	360	60	10		70
9. New Const. Sub Rehab Related Infrastructure											
10. Rental Assistance	120	120	24	72	18	6	120				
11. Homebuyer Assistance											
12. Support Services											
13. Total Low-Income (Line 1 and 7)	2,520	2,530	512	1,076	444	398	2,430	90	10		100
14. Other Income (More than 80% if MFI)*		70	10	50	10		70				
15. Grand Total		2,600	522	1,126	454	398	2,500	90	10		100

*Or, if appropriate, based on HUD Income limits with required statutory adjustments

CHAS Table 5B [2]

Goals for Families to be Assisted with Housing (without HUD funds)

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

Comprehensive Housing Affordability Strategy (CHAS)

Name of Jurisdiction(s) or Consortium: The City of San Diego

FY: 92

Assistance Provided by Income Group	Total Section 215 Goals	Total Goals	Renters					Owners			
			Elderly 1 & 2 Member Households	Small Related (2 to 4)	Large Related (5 or more)	All Other Households	Total Renters	Existing Homeowners	First Time Homebuyers With Children	First Time Homebuyers All Others	Total Homeowners
Without HUD Assistance	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	
1. Very Low-Income (0 to 50% MFI)*	1,460	1,860	276	536	183	215	1,210	650			650
2. Mod Rehab & Acquisition*	1,380	1,380	140	420	140	30	730	650			650
3. New Const. Sub Rehab, Related Infrastructure	80	80	36	16	18	10	80				
4. Rental Assistance											
5. Homebuyer Assistance											
6. Support Services		400	100	100	25	175	400				
7. Other Low-Income (51% to 80% of MFI)*	80	239	9	10		15	34		150	55	205
8. Mod Rehab & Acquisition											
9. New Const. Sub Rehab Related Infrastructure	30	34	9	10		15	34				
10. Rental Assistance											
11. Homebuyer Assistance	50	205							150	55	205
12. Support Services											
13. Total Low-Income (Line 1 and 7)	1,540	2,099	285	546	183	230	1,244	650	150	55	855
14. Other Income (More than 80% if MFI)*		360							200	160	360
15. Grand Total		2,459	285	546	183	230	1,244	650	350	215	1,215

*Or, if appropriate, based on HUD Income limits with required statutory adjustments

* Of 1380 households, 1300 are assisted through weatherization programs, 40 through redevelopment activities and 40 through the State's Emergency Shelter Program.

in the project for a specified term. It is anticipated that construction of more than 300 affordable rental units will be initiated during FFY 92. This total is comprised of new public housing, tax credit projects, redevelopment projects and projects supported by the Housing Trust Fund. The size of the projects will vary, however, most are expected to be small, ranging from 10 to 40 units.

2. Acquisition

100 Percent Affordable - this typically involves the acquisition of additional public housing stock and multi-family housing acquired utilizing multiple subsidies including low-income tax credits and local assistance.

Less than 100 Percent Affordable - this typically involves multi-family housing acquired by the private sector utilizing public funds along with (a) conventional loan(s) in exchange for an agreement to impose occupancy and rent restrictions on a portion (usually 20 percent) of units in the project for a specified term.

Acquisition of nearly 200 units is anticipated. The acquisition of public housing units account for about one-half of the activity; the remaining units are expected to result from the acquisition of projects wherein 20 percent of the units are restricted at affordable rates and 80 percent of the units are market rate. Approximately 200 first-time homeowners will also be assisted through MCCs and local programs.

3. Rental Assistance

Typically provided through issuance of a Section 8 Certificate or Voucher to eligible very low-income families. Under this program, families lease housing available on the private market and pay 30 percent of their income for rent (and utilities); the landlord receives federal funds to cover that portion of the rent not paid by the tenant.

Rental assistance will be provided to approximately 400 families through new Section 8 existing allocations. In addition, approximately 200 families will be served through support from the new HOME program, Rental Rehabilitation Program Repayment funds, homeless programs, and local funds. As noted above, the target population for Section 8 assistance is very low-income families. However, those served through the other forms of assistance will be a combination of very low- and low-income families.

4. Rehabilitation

Below market-rate loans and grants to finance rehabilitation are made available to eligible homeowners and owners of rental residential property. Following rehabilitation, units provide decent, safe, and sanitary homes for eligible families, many of whom also receive rental

assistance. This program also incorporates weatherization of eligible housing at minimum or no cost to the property owner.

Most rehabilitation activity occurs through Housing Commission programs or state supported weatherization programs provided by MAAC and Campesinos Unidos, Inc. Of the more than 1,000 units anticipated through Housing Commission programs, most will be in small rental projects, often 4-6 units in size, with the remaining number generated through the rehabilitation of several larger projects of more than 50 units in size, or through owner-occupied homes. Nonprofits are expected to provide weatherization services to housing occupied by another 1300, or more, lower-income renters and homeowners.

Housing assistance not depicted in Tables 5B[1] and 5B[2] include those units which may be produced without the benefit of public funds such as those units produced through the Density Bonus Program (approximately 50 units annually) and, if approved, the Inclusionary Housing Program (estimated to produce 800 units annually).

Some families receiving housing assistance, through the infusion of public funds or through land use regulations, also receive support through the provision of such services as: job training, parent education, and child day care.

B. Action Plan

As can be seen from comparing information in Tables 3 and 5B, the City of San Diego's first year goals for very low-income families are consistent with its 5 year assistance priorities. The City's first assisted housing priority according to its 5 year plan (depicted in Table 3 on page 54), is to provide housing opportunities affordable to very low-income San Diegans through new construction, acquisition, and the rehabilitation of rental housing, and through the provision of rental assistance. Of the approximately 5000 additional families expected to receive housing assistance during FFY 92, nearly 4000 families are categorized as very low-income according to Tables 5B[1] and 5B[2] on pages 88 and 89. Most assistance is provided to renters (some of whom will also receive related support services), with much lower levels of assistance expected to be available to existing and first-time home buyers. Among those in this income group most likely to receive assistance with homeownership are a limited number of mobile homeowners seeking assistance for purchase of their mobile home park. Although many existing homeowners in this category receive assistance provided without HUD funding, most is in the form of housing weatherization which can be provided at only a small cost per household.

A further comparison of information in Table 3 and in Tables 5B[1] and 5B[2] indicates that FFY 92 housing goals for "other low-income" families and for those earning more than 80 percent of median income are at levels below those for very low-income families; yet, goals for families in these income groups differ from the City's 5 year priorities. Instead of providing more

assistance to low-income renters and existing homeowners than is provided to first-time home buyers, the City anticipates that about 500 families in each category will receive housing assistance. First-time home buyers will receive relatively more assistance than indicated by their priority ranking because of opportunities created by anticipated funding available for this activity. Only a small number of families in these income categories are expected to receive related support services.

1. Areas of the City Eligible for Housing Assistance

In accordance with the San Diego's Balanced Communities Policy, housing assistance can generally be provided throughout the City. The City does, however, attempt to influence the pattern of service delivery of some housing assistance. The City, through its Housing Commission, provides limited incentives to families receiving Section 8 rental assistance who lease housing in areas of the City where assisted tenants are under-represented. Rehabilitation of rental units, under HUD's now defunct Rental Rehabilitation Program, has occurred throughout the southern portion of the City, with the bulk of activity taking place in the older sections (See Figure 9: Eligible Rental Rehabilitation Program Areas). In addition, to date, most homeowner rehabilitation has taken place in older areas of the City, which are targeted under the CDBG Program (See Figure 10: Eligible CDBG Homeowner Rehabilitation Areas). In the case of development in which all units are restricted by income, such as public housing, site selection guidelines have been established to help ensure that units are built in areas throughout the City where sufficient services (e.g. schools, health care, transportation, etc.) are available, and not where a high concentration of low-income households is already present.

2. Administration and Management of Housing Assistance

Most lower-income San Diegans receiving housing assistance are doing so through programs administered by the San Diego Housing Commission. The City, through its Commission, provides rental assistance through the issuance of Section 8 Certificates and Vouchers, rehabilitates deteriorated units housing lower-income San Diegans, manages existing public housing developments, develops new public housing and other affordable housing, and will soon administer its affordable housing programs funded under the new federal HOME Program. In addition, the Commission is responsible for ensuring compliance with contract provisions concerning most affordable housing resulting from land use concessions and favorable financing provided with the benefit of public funds. Additional housing assistance is administered by the City's Redevelopment Agency, primarily through Centre City Development Corporation and Southeast Economic Development Corporation, and by the San Diego Housing Trust Fund. TheCity Council has ultimate responsibility for the administration and management of housing assistance acting as the Council, Housing Authority, or Redevelopment Agency.

FIGURE 9: RENTAL REHABILITATION PROGRAM AREAS

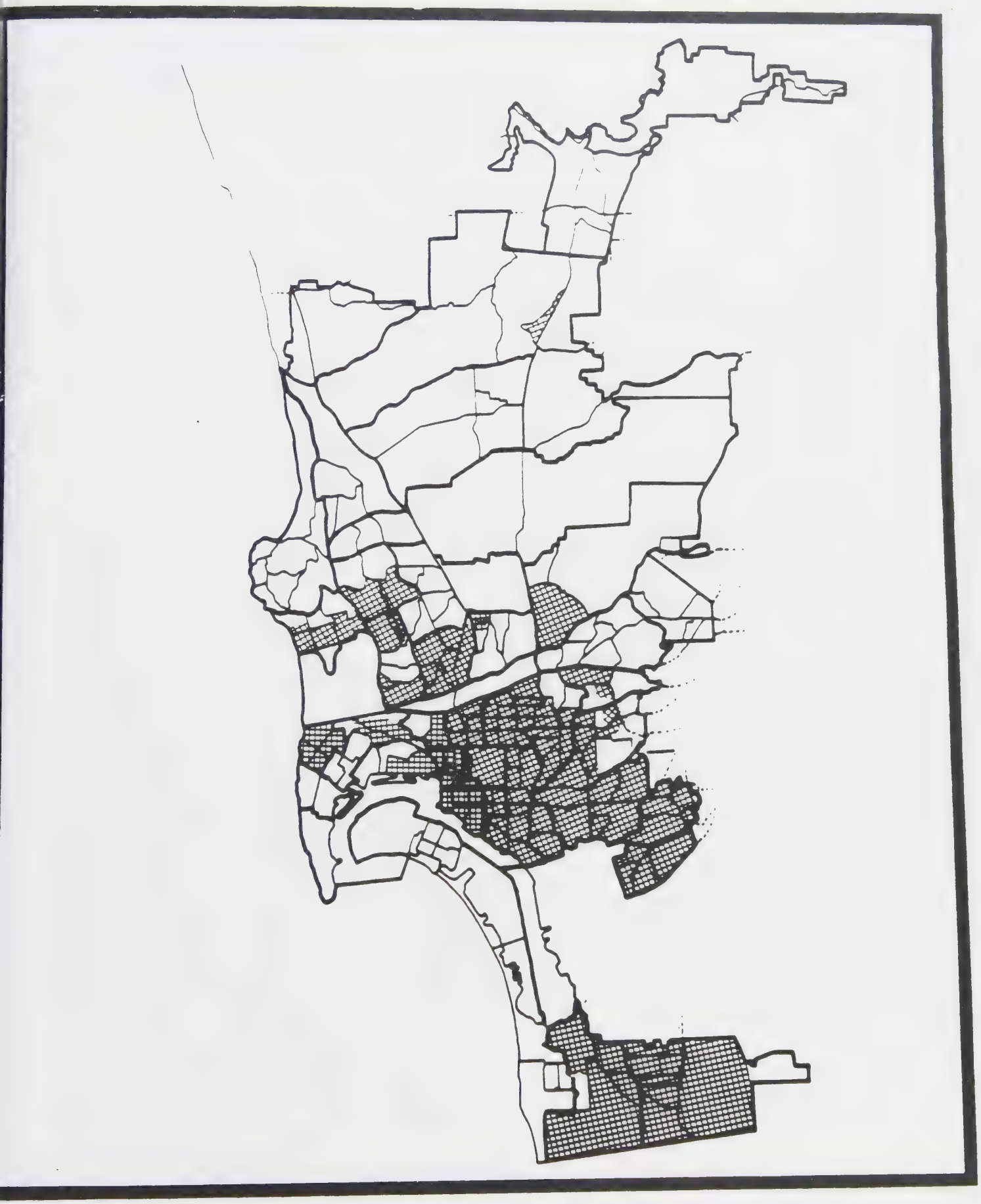


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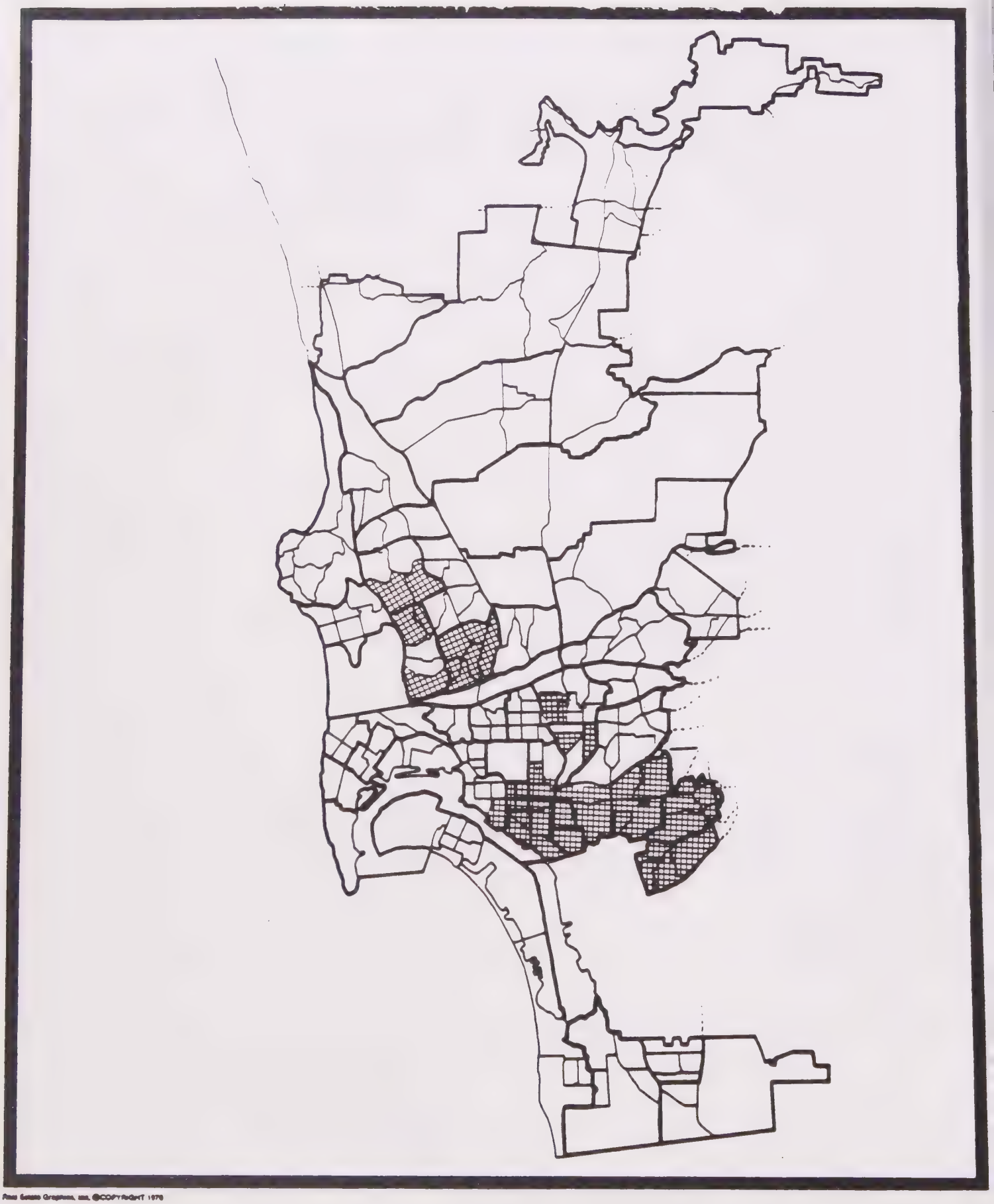
FIGURE 10: CDBG HOME OWNER REHABILITATION AREAS



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3. Time Required for Delivery of Housing Assistance

How long prospective recipients must wait before receiving housing assistance varies widely. For example, most very low-income San Diegans presently receiving housing assistance are receiving Section 8 rental assistance. More than 17,000 families and elderly households are currently on the Housing Commission's list of those waiting for Section 8 rental assistance (an additional 8,000 families and elderly households are on the Commission's waiting lists for public housing and State rental assistance). In most instances, families seeking housing assistance must wait for a period ranging from two to five years before that assistance is provided. The actual delay between application and delivery of assistance can be influenced by several factors including: family size, federal preference eligibility, and the applicant's willingness to take advantage of public housing opportunities rather than waiting longer for rental assistance provided through the Section 8 Program.

4. Provision of Housing Assistance to Those with Federal Preferences

Those applicants with federal preferences will continue to receive assistance in federal housing programs before applicants without such preferences. Eligible applicants who pay more than 50 percent of household income toward the cost of housing, live in substandard housing, or are involuntarily displaced through government action are considered to have a federal preference.

5. Removing Obstacles to Affordable Housing

San Diego recognizes that several obstacles, listed in Part 3 of this document, may hinder efforts to provide housing affordable to its residents. Therefore, in addition to bridging the affordability gap through the infusion of public monies, the City is committed to removing affordable housing barriers, and will modify programs, procedures, and policies to do so. The City is currently awaiting recommendations from several task forces established to examine issues related to housing affordability. For example, The Inclusionary Housing Task Force, established by the Housing Commission, is examining ways the City can promote the development of housing affordable to low- and median-income San Diegans. Among items to be discussed by the task force are the current approval process for new development, allowable densities, and development fee rates. Recommendations concerning an inclusionary housing program and these related issues will be presented to the Housing Commission Board and then to City Council during FFY 92. The City Council is also expected to consider, in this time frame, recommendations concerning urban form and simplification of the building code, as well as recommendations presented when the Housing Element to the General Plan is updated.

C. Monitoring Plan

Housing programs supported with federal funds and subject to the CHAS will be monitored on a regular basis to ensure compliance with occupancy and affordability requirements. The San Diego Housing Commission monitors all of the City's affordable housing supported with federal funds awarded to the jurisdiction or the public housing authority, and will continue to do so. In addition, the Commission monitors affordable housing projects that utilize: favorable financing provided through the housing agency and (in many cases) the redevelopment agency, density bonuses, Coastal Housing provisions, public land, or senior conditional use permits. In all, the Commission monitors approximately 9,000 units on an annual basis, half of which are affordable units provided by the private sector through land use concessions or favorable financing utilized in exchange for those units and the remaining affordable units are provided through public housing and Section 8 rental assistance. Affordable housing projects receiving direct funding from the state or federal government are often monitored solely by those entities.

The City is confident that sufficient project information will be available to enable successful participation in the HUD cash and management system under HOME. The City, through its Housing Commission, has been using the HUD cash and management system related to the transfer of federal Rental Rehabilitation monies for several years.

D. Homeless Action Plan

The City of San Diego plans to continue the practice of having private non-profit entities provide most housing assistance to homeless individuals and families through the use of emergency shelters and additional emergency beds available during inclement weather, as well as transitional housing and related support services. In addition, the City is encouraging proposals under Shelter Plus Care, a program which coordinates support services and rental assistance for homeless populations. Also, a limited amount of Section 8 rental assistance issued through the Housing Commission is available for use by the homeless. The City also supported a new day center where homeless San Diegans can receive mail, shower, wash clothes, and have use of a telephone. Homeless facilities and services are also supported by state and federal funds, as well as private donations. Service providers have found it most difficult to secure support for continued operations once the service facility has been obtained. The City anticipates that, during FFY 92, most homeless services will continue to be available in and near the downtown area.

FFY 92 goals are to increase shelter capacity by about 75 beds from its current level of 1435 (as documented by the Regional Task Force on the Homeless). An additional 6,000 bed-nights will be made available to address greater needs resulting from inclement weather. The City's Housing Commission will continue supporting transitional housing activities with local monies, and this support will be complemented by new Housing Trust Fund monies dedicated to

transitional housing activities. This year, the Commission will stress the need for effective case management to increase the rate of successful program completion by participants. In all, more than 600 people will receive transitional housing and related services during the year.

In addition to services mentioned above, the Emergency Resource Group offers, on behalf of the City, temporary assistance with payment of rents and mortgages to those threatened with homelessness.

E. Action Plan for Those with Other Special Needs

To the extent possible, housing and related assistance will be provided during the year to persons with AIDS, under-housed and homeless agricultural workers, battered women, the mentally ill, and homeless youth.

Truax House will continue to make use of a city-owned residence to provide housing at no charge for a limited number of persons with AIDS who continue to be ambulatory; operational costs will continue to be covered with state funding. Furthermore, the City is currently reviewing options to increase housing assistance available to those afflicted with AIDS.

San Diego will rehabilitate a small number of city-owned houses for use by agricultural workers living at its northeastern edge. Plans will also proceed to use trailers to house 40 agricultural workers in a temporary campground setting. Furthermore, San Diego will continue to explore, with a non-profit developer, the possibility of utilizing the temporary campground approach to provide housing for an additional 40 seasonal agricultural workers employed in the City.

It is hoped that approximately 45 homeless teens will receive transitional housing and related assistance through a newly-proposed facility. A small number of battered women and those who are mentally-ill will receive housing assistance in supervised settings through continuing programs.

COMMUNITY INVOLVEMENT IN CHAS DEVELOPMENT

Responsibility for development of the City's CHAS was delegated to the San Diego Housing Commission. The Commission serves as the City's Housing Authority and has responsibility for developing local affordable housing programs and implementing and administering State and Federal affordable housing programs. Since its inception in 1979, the Commission has generated approximately 19,000 units for low-income, elderly and disabled persons throughout the City.

Beginning in April 1991, the Program and Policy Development unit of the San Diego Housing Commission began coordinating development of the City's CHAS. April and May were spent gathering, assimilating, and clarifying, where necessary, statutory and regulatory information pertaining to the CHAS. Part of May was also used to organize a public forum for the purpose of soliciting citizen participation early in the process.

The City's first public forum on CHAS was scheduled for June 5, 1991 at the Veterans War Memorial building, a public facility located in the central part of the City. Two sessions, one at 4:00 p.m. and one at 6:00 p.m., were scheduled in order to provide people who had work conflicts with the opportunity to attend. A notice announcing the public forum (see Addendum 4) was published in four newspapers, one of which was a major daily newspaper (*The San Diego Union*), two of which were weekly community papers (*The San Diego Voice and Viewpoint and La Prensa*), and the remaining one was a daily business paper (*The San Diego Transcript*). In addition to these notices, a letter announcing the forum was sent to 1800 people with interests in affordable housing (Addendum 5). Those on the mailing list included representatives of housing and social service organizations, city and county employees involved in housing and social services, developers, affordable housing advocates, non-profit corporations, community activists, and local, state and federal officials.

Fifty-five (55) members of the public attended the two sessions, along with four (4) Housing Commissioners and six (6) Housing Commission staff members. Two Housing Commissioners presided at each session. In opening the sessions, a Commission member welcomed participants and informed them of the forum's three-fold purpose: (1) to explain what CHAS is and the procedure and time line for developing it; (2) to solicit their views on low-income housing needs and on a strategy to address those needs; and (3) to record major concerns.

Following the June 5, 1991 public hearing, a draft, which included a Spanish translation of the Executive Summary--20.6 percent of the City's population is Hispanic--, was written by San Diego Housing Commission staff and submitted to the Commission at its August 5, 1991 meeting. The August 5th meeting was duly publicized in accordance with Commission procedure. At its meeting, the Commission authorized staff to circulate the draft CHAS for a 60-day public comment period which would extend from August 7 to October 7, 1991. In compliance with the Commission's action and with HUD regulations, a public notice announcing

the availability of the CHAS at seven public facilities throughout the City was published in four newspapers (Addendum 4). The four newspapers are the same as those used for the June 5, 1991 Public Forum Notice. In addition, copies of the draft document were mailed to attendees of the June 5th public forum, along with a letter informing them that a second forum would be scheduled shortly to solicit comments.

The second public forum was scheduled for August 21, 1991 at the same location as the first forum, the Veterans War Memorial Building in central San Diego. Only one session at 6:00 p.m. was held, and the same 1800 people were invited to attend.

Thirty-six (36) people attended the second forum, along with two (2) Housing Commissioners and five (5) Housing Commission staff members. The format for this forum was similar to that of the first. A Housing Commission member opened by thanking the public for attending and by noting the purposes of the forum: (1) to provide the public with an overview of the draft CHAS; (2) to begin soliciting their views on the draft; and (3) to summarize major public concerns.

Following the close of the public comment period on October 7, 1991, Housing Commission staff addressed public comment and revised the document, as appropriate. Staff then submitted a new draft to the City Council for consideration at its meeting of October 29, 1991. Two public notices announcing the meeting were publicized. One was prepared by the City's Clerk's Office in accordance with normal procedure for City Council meetings; the other was prepared by the Housing Commission, and announced that the CHAS would be included on the Council's October 29, 1991 agenda at which time the public would have an opportunity to speak. The Housing Commission public notice was printed in the same newspapers used for the June 5, 1991 Public Forum Notice and the Housing Commission Public Comment Period Notice.

At the October 29, 1991 meeting, the Council voted to postpone consideration of the CHAS until November 12, 1991, in order to give members additional time to review the revised document. The November 12, 1991 City Council meeting was duly publicized by the City Clerk's Office. However, during the November 12, 1991 meeting, a second postponement until December 9, 1991 was approved by the Council. The December 9th meeting was subsequently publicized by the City Clerk's Office. On December 9, 1991 the City Council unanimously approved the CHAS by a vote of 8 - 0, with one member absent. A final draft was submitted to HUD on January 3, 1992. HUD subsequently approved the document on February 28, 1992.

Aside from the oral comments made at the two public forums, the Housing Commission received written comments on the CHAS. In an effort to summarize all comments, the Commission has categorized them by subject matter. In some cases, issues addressed by comments were already included in the CHAS as noted. Those which were responded to are appropriately noted. In cases where comments were not addressed in the CHAS, a reason has been stated.

Comments Regarding Needs

1. There is a need for support of non-profits in the areas of technical assistance and capacity building. (INCORPORATED)

2. Pre-development and site acquisition money is needed by non-profits. (INCORPORATED)

3. Alternative forms of housing, such as Co-housing and Colonias, are needed. (INCORPORATED)

4. The homeless in the City should be a high priority. More transitional housing facilities should be generated to meet their needs. (HOMELESS AND TRANSITIONAL HOUSING ACTIVITIES FOCUSED ON THOSE WITH VERY LOW-INCOME CONTINUE TO BE LISTED AS SECOND PRIORITY ACTIVITIES BASED ON THE EXTENT OF THE EMERGENCY AND TRANSITIONAL HOUSING NEED COMPARED TO PERMANENT HOUSING FOR VERY LOW-INCOME SAN DIEGANS AND THE RESOURCES DEVOTED TO MEET THE NEED.)

5. The elderly should be a high priority. The elderly should be given more choices in terms of affordable housing opportunities. (ASSISTANCE FOR ELDERLY HOUSEHOLDS CONTINUES TO BE GIVEN FIRST TO THIRD PRIORITY RANKING.)

6. The disabled and mentally-ill should be included in an affordable housing strategy. (INCORPORATED)

7. Mobile home parks should be included in an affordable housing strategy. (INCORPORATED)

8. Low-income people and neighborhoods should be the target of the CHAS. (HOUSING ASSISTANCE PROVIDED TO VERY LOW-INCOME SAN DIEGANS CONSISTENT WITH THE CITY'S BALANCED COMMUNITIES POLICY REMAINS A FOCUS OF THE CHAS; HOWEVER, LOW-INCOME SAN DIEGANS AND NEIGHBORHOODS ARE ADDRESSED IN THE CHAS AS A SECOND PRIORITY.)

Comments on Policy Issues

1. Condominium conversions are an issue as they take affordable housing units off the market. (CHANGE OF USE--AFFORDABLE TO MARKET RATE-- WILL BE ADDRESSED WITH ISSUES OF DEMOLITION AND PRESERVATION.)

2. Restrictions should be placed on the demolition of affordable housing in the CHAS. (ADDRESSED BY CHAS).

3. The City's multi-family design regulations are burdensome and costly. (ADDRESSED BY CHAS)

4. Fees on new construction are burdensome and increase housing costs. (ADDRESSED BY CHAS)

5. Restrictions on the rental of single-family houses preclude affordable housing opportunities. (ADDRESSED BY CHAS)

6. The development process is over-regulated and processing time is too long. (ADDRESSED BY CHAS)

7. Downzonings in the City have precluded nearly 7,000 additional housing units. (ADDRESSED BY CHAS)

8. Growth restrictions are a barrier to affordable housing. (ADDRESSED BY CHAS)

9. Article 34 of the State Constitution which restricts the development of affordable housing should be amended. (ADDRESSED BY CHAS)

10. Increased attention should be placed on the acquisition of public housing rather than on new construction to hold down costs. (THE CITY'S STRATEGY INCORPORATES BOTH ACQUISITION AND NEW CONSTRUCTION OF PUBLIC HOUSING; HOWEVER, RECENT TRENDS INDICATE INCREASED RELIANCE ON ACQUISITION.)

11. Emphasis should be placed on the preservation of at-risk affordable units. (ADDRESSED BY CHAS)

12. Develop zoning and regulatory incentives to promote affordable housing, i.e., decreased fees, expedited processing, affordable housing overlays. (INCORPORATED)

13. Amend the Granny Flat ordinance to make it more effective. (ADDRESSED BY CHAS)

14. Eliminate reserved parking from residential areas. (A REDUCTION IN PARKING REQUIREMENTS IS ADDRESSED BY CHAS.)

Comments on Resources

1. Every attempt should be made to comply with matching requirements in order to garner as much funding as possible. (ADDRESSED BY CHAS)

2. Non-profits are a big resource for the provision of affordable housing and the City should use them more effectively. (ADDRESSED BY CHAS)

Comments on Strategy

1. In its revised draft, the City should strengthen its strategy to remove the negative effects of public policies. (INCORPORATED)

2. The City should discuss the San Diego Home Loan Counseling Center as part of the non-profit sector. (INCORPORATED)

3. The City should discuss Catholic Community Services as part of the non-profit sector. (ADDRESSED BY CHAS - as Catholic Charities)

4. Bank America has been a major player in the Community Reinvestment Program. As of 1990, it had invested a total of $555 million in community reinvestment and related business. (INCREASED REFERENCE TO THE COMMUNITY REINVESTMENT ACT HAS BEEN INCORPORATED)

5. Encourage more group homes and bring them into conformity with the Fair Housing Act. (INCORPORATED)

6. Encourage Community Plans to address affordable housing. (INCORPORATED)

7. Strengthen first-time home buyer programs with home loan counseling. (INCORPORATED)

8. Implement an Inclusionary Housing Program in the City. (INCORPORATED)

9. Community interaction in the design of neighborhoods and low-income developments should be encouraged. (THE CHAS PROCESS ENCOURAGES COMMUNITY PARTICIPATION IN DEVELOPMENT AND MONITORING OF THE CITY'S STRATEGY, WHICH INCLUDES DESIGN OF NEIGHBORHOODS AND DEVELOPMENTS.)

10. The City should not develop $600/month SROs. (ALTHOUGH SRO HOTELS ARE RECOGNIZED AS AN ALTERNATIVE HOUSING TYPE, LOCAL PRIORITIES STRESS THE PROVISION OF HOUSING AFFORDABLE TO VERY LOW-INCOME

PEOPLE. THEREFORE, PUBLIC ASSISTANCE IS NOT ANTICIPATED FOR SROS WHICH RENT FOR $600 PER MONTH.)

11. The City should encourage low-cost cooperatives. (INCORPORATED)

12. Better coordination throughout the bureaucratic system is needed. (ADDRESSED BY CHAS)

13. Encourage alternative forms of housing. (INCORPORATED)

14. Several comments were received concerning priorities and potential modification thereof. (PRIORITIES REFLECT THE EXTENT OF THE HOUSING NEED BY VERY LOW-INCOME, LOW-INCOME, AND MODERATE-INCOME SAN DIEGANS. A LOWER PRIORITY MAY REFLECT A FEWER NUMBER OF PERSONS OF A CATEGORY IN NEED AND IS NOT MEANT TO MINIMIZE INDIVIDUAL HARDSHIP.)

CERTIFICATIONS

1. Fair Housing Certification

2. Relocation and Acquisition Certification

THE CITY OF
SAN DIEGO
AMERICA'S FINEST CITY

MAUREEN O'CONNOR
MAYOR

December 9, 1991

The Honorable Jack Kemp
Secretary of Housing and Urban Development
U.S. Department of Housing and Urban Development
451 Seventh Street, SW
Washington, D.C. 20410

Subject: CHAS Fair Housing Certifications

Dear Mr. Secretary:

The City of San Diego hereby certifies that it will affirmatively further fair housing in the administration of housing and community development activities in the private and public sectors. The City of San Diego further certifies that it will maintain supporting evidence which shall be kept available for inspection by the Secretary, the Inspector General, and the public.

Sincerely,

Maureen O'Connor

Maureen O'Connor
Mayor

CITY ADMINISTRATION BUILDING, 202 C STREET SAN DIEGO CALIFORNIA 92101 (619) 236 6330

THE CITY OF
SAN DIEGO
AMERICA'S FINEST CITY

MAUREEN O'CONNOR
MAYOR

December 9, 1991

The Honorable Jack Kemp
Secretary of Housing and Urban Development
U.S. Department of Housing and Urban Development
451 Seventh Street, SW
Washington, D.C. 20410

Subject: CHAS Relocation and Acquisition Certification

Dear Mr. Secretary:

The City of San Diego hereby certifies that it will comply with the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, implementing regulations at 49 CFR 24, and the requirements governing the residential antidisplacement and relocation assistance plan under section 104(d) of the Housing and Community Development Act of 1974 (including a certification that the jurisdiction is following such a plan).

Sincerely,

Maureen O'Connor

Maureen O'Connor
Mayor

CITY ADMINISTRATION BUILDING 202 C STREET SAN DIEGO CALIFORNIA 92101 (619) 236 6330

ADDENDA

1. General Definitions
2. Low- and Moderate-Income Rent Calculations
3. Local Non-Profits Active in Affordable Housing
4. Public Notices
5. Public Forum Invitations
6. Written Public Comments
7. CHAS Rules and Regulations, Federal Register, 2/4/91
8. Executive Summary: Spanish Translation
9. December 9, 1991 City Council Resolution
10. Methodology

ADDENDUM 1

GENERAL DEFINITIONS USED WITH THE CHAS

Affordability Gap: The extent to which gross housing costs, including utility costs, exceed 30 percent of gross income.

Affordable Housing: Affordable housing is generally defined as housing where the occupant is paying no more than 30 percent of gross income for gross housing costs, including utility costs.

Committed: Generally means there has been a legally binding commitment of funds to a specific project to undertake specific activities.

Cost Burden Greater than 30 Percent: The extent to which gross housing costs, including utility costs, exceed 30 percent of gross income, based on data published by the U.S. Census Bureau.

Cost Burden Greater than 50 Percent : The extent to which gross housing costs, including utility costs, exceed 50 percent of gross income, based on data published by the U.S. Census Bureau.

Elderly Household: One or two person households containing a person at least 62 years of age, and non-elderly handicapped individuals, including those currently institutionalized but who are capable of "group home" living.

Family: A household comprised of one or more individuals.

Family Self-Sufficiency (FSS) Program: A program enacted by Section 554 of the National Affordable Housing Act which directs Public Housing Agencies (PHAs) and Indian Housing Authorities (IHAs) to use Section 8 assistance under the rental certificate and rental voucher programs, together with public and private resources, to provide supportive services to enable participating families to achieve economic independence and self-sufficiency.

First Time Home Buyer: An individual or family who has not owned a home during the three-year period preceding the HUD-assisted purchase of a home that must be used as the principal residence of the home buyer.

Group Quarters: A facility housing groups of persons not living in households (U.S. Census definition).

HOME: The HOME Investment Partnerships Act, which is Title II of the National Affordable Housing Act establishes a new block grant program to fund rental and homeownership opportunities through new construction, acquisition, and rehabilitation.

Housing Problems: A non-duplicative estimate of the number of rental households that have physical defects, are overcrowded, or whose occupants are paying greater than 30 percent of household income for rent (U.S. Census definition).

Large Family: A family household with 5 or more members.

LIHTC: (Federal) Low-income Housing Tax Credit.

HOPE: The homeownership and opportunity for people everywhere program has been established under Title IV of the National Affordable Housing act. It provides homeownership opportunities for low-income households through the purchase of public housing, multi-family units and single-family homes.

Low/Lower-income: Families or households whose incomes are from 0 to 80 percent of the median income for the area, as determined by the Secretary of HUD, with adjustments for smaller and larger families, and for certain areas.

Middle-income Households: Families or households whose incomes are from 96 to 120 percent of the median income for the area, as determined by the Secretary of HUD, with adjustments for smaller or larger families, and for certain areas.

Moderate-income Households: Families or households whose incomes are 81 to 95 percent of the median income for the area, as determined by the Secretary of HUD, with adjustments for smaller or larger families, and for certain areas.

Other Household: A household in which the head of the household lives alone or with non-relatives only. "Elderly Households," as defined above, are excluded from this definition.

Other Income: Families or households whose incomes exceed 80 percent of the median income for the area, as determined by the Secretary, with adjustments for smaller or larger families.

Other Low-income: Families or households whose incomes are between 51 and 80 percent of the median income for the area, as determined by the Secretary, with adjustments for smaller and larger families.

Other Persons with Special Needs: Includes persons with AIDS, disabled families, and families participating in organized programs to achieve economic self-sufficiency. This category does not include homeless.

Overcrowded: A housing unit containing more than one person per room.

Public Housing CIAP: Public Housing Comprehensive Improvement Assistance Program.

Public Housing MROP: Public Housing Major Reconstruction of Obsolete Projects.

Section 215: Section 215 of Title II of the National Affordable Housing Act. Section 215 defines what constitutes "affordable" housing projects under the Title II HOME program.

Sheltered: Families and person whose primary nighttime residence is a supervised publicly or privately operated shelter (e.g., emergency, transitional, battered women, and homeless youth shelters; and commercial hotels or motels used to house the homeless). Sheltered homeless does not include any individual imprisoned or otherwise detained pursuant to an Act of Congress or State law.

Small Family: A 2, 3 or 4 member family household, which is not an "elderly household" as defined above.

Supportive Housing: Housing with a supporting environment, such as group homes or Single Room Occupancy (SRO) housing and other housing that includes a planned service component.

Supportive Services: Services provided to residents of supportive housing for the purpose of facilitating the independence of residents. Some examples are case management, medical or psychological counseling and supervision, child care, transportation, and job training.

Tenant Assistance: Rental assistance payments provided as either project-based rental assistance or tenant-based rental assistance.

Very Low-income: Families whose income does not exceed 50 percent of the median family income for the area, as determined by the Secretary, with adjustments for smaller and larger families.

SAN DIEGO HOUSING COMMISSION LOW AND MODERATE INCOME RENTAL RATE CALCULATIONS

EFFECTIVE April 1991 — U.S. Department of Housing and Urban Development 1991 SAN DIEGO MEDIAN INCOME $41,300

No of Bedrms	Utility Allow.	Family Size	Single Room Occupancy Only 40%			50%			60%			65%			70%			75%		
			Income	30%	RENT	Income	30%	RENT	Income	30%	RENT	Income	30%	RENT	Income	30%	RENT	Income	30%	RENT
STUDIO	$16	ONE	$11,550	$289	$289	$14,450	$361	$345	$17,350	$434	$418	$18,800	$470	$454	$20,250	$506	$490	$21,700	$543	$527
ONE	$21	TWO	$13,200	$330	$330	$16,500	$413	$392	$19,800	$495	$474	$21,500	$538	$517	$23,150	$579	$558	$24,800	$620	$599
TWO	$42	THREE				$18,600	$465	$423	$22,300	$558	$516	$24,150	$604	$562	$26,000	$650	$608	$27,900	$698	$656
	$42	FOUR				$20,650	$516	$474	$24,800	$620	$578	$26,850	$671	$629	$28,900	$723	$681	$31,000	$775	$733
THREE	$63	FIVE				$22,300	$558	$495	$26,750	$669	$606	$29,000	$725	$662	$31,200	$780	$717	$33,450	$836	$773
	$63	SIX				$23,950	$599	$536	$28,750	$719	$656	$31,150	$779	$716	$33,550	$839	$776	$35,950	$899	$836
FOUR	$83	SEVEN				$25,600	$640	$557	$30,750	$769	$686	$33,300	$833	$750	$35,850	$896	$813	$38,400	$960	$877
FIVE	$105	EIGHT				$27,250	$681	$576	$32,700	$818	$713	$35,450	$886	$781	$38,150	$954	$849	$40,900	$1,023	$918

No of Bedrms	Utility Allow.	Family Size	80%			90%			100%			110%			120%		
			Income	30%	RENT	Income	30%	RENT	Income	30%	RENT	Income	30%	RENT	Income	30%	RENT
STUDIO	$16	ONE	$23,150	$579	$563	$26,000	$650	$634	$28,900	$723	$707	$31,800	$795	$779	$34,700	$868	$852
ONE	$21	TWO	$26,450	$661	$640	$29,750	$744	$723	$33,050	$826	$805	$36,350	$909	$888	$39,650	$991	$970
TWO	$42	THREE	$29,750	$744	$702	$33,450	$836	$794	$37,150	$929	$887	$40,900	$1,023	$981	$44,600	$1,115	$1,073
	$42	FOUR	$33,050	$826	$784	$37,150	$929	$887	$41,300	$1,033	$991	$45,450	$1,136	$1,094	$49,550	$1,239	$1,197
THREE	$63	FIVE	$35,700	$893	$830	$40,150	$1,004	$941	$44,600	$1,115	$1,052	$49,050	$1,226	$1,163	$53,500	$1,338	$1,275
	$63	SIX	$38,350	$959	$896	$43,100	$1,078	$1,015	$47,900	$1,198	$1,135	$52,700	$1,318	$1,255	$57,500	$1,438	$1,375
FOUR	$83	SEVEN	$40,950	$1,024	$941	$46,100	$1,153	$1,070	$51,200	$1,280	$1,197	$56,350	$1,409	$1,326	$61,450	$1,536	$1,453
FIVE	$105	EIGHT	$43,600	$1,090	$985	$49,050	$1,226	$1,121	$54,500	$1,363	$1,258	$59,950	$1,499	$1,394	$65,400	$1,635	$1,530

Utility Allowance Revised

Based on 5/1/89 HUD Rates

1. Income = Gross annual income adjusted by family size.
2. 30% = The monthly amount of family income used for housing expenses. (Annual Income divided by 12 months times .30)
3. Rent = 30% of the family income (as calculated in 2. above) less the utility allowance.

ADDENDUM 3
LOCAL NON-PROFITS ACTIVE IN AFFORDABLE HOUSING DEVELOPMENT AND RELATED SERVICES

Adams Avenue B.I.D.
AIDS Foundation of San Diego
Alpha Project
Association for Retarded Citizens
Barrio Station
Black Federation of San Diego
California Housing Partnership
California Rural Legal Assistance
Campesinos Unidos, Inc.
Casa Familiar/San Diego
Casa Familiar/San Ysidro
Catholic Charities
Certified Development Corporation
Chicano Federation
Chinese Consolidated
City Heights CDC
Civic Center Barrio Housing
COACH
Community Congress
Community Correction
Community Resources
Community Service Center
Crisis House
East San Diego Presbyterian Church
Episcopal Community Services
Esperanza International
Fair Housing Council of San Diego
Golden Hill Revitalization Project
Gray Panthers
Habitat for Humanity
HOPE CDC
Housing Opportunities, Inc.
Housing Trust Fund Project
Humanitas Foundation
Interfaith Housing Assistance Corporation
Joan Kroc Center
Labor's Community Service Agency
Life Ministries Rescue Mission

Linda Vista CDC
Local Initiatives Support Corporation
Logan Heights Family Health
Lutheran Social Services
Mental Health Systems
Metropolis
Metropolitan Area Advisory Committee Project
Metropolitan Fellowship Foundation
Mid-City Senior Enterprises
Neighborhood House Association
Neighborhood Housing Services
Newland California
Nonprofit Federation for Housing and Community Development
Normal Heights CDC
Occupational Training Services
Office for Justice & Peace
Pacific Beach Presbyterian Church
Regional Task Force on the Homeless
Resident Relations Foundation
Revisions Resources
San Diego Co-Housing Coalition
San Diego Community Foundation
San Diego Ecumenical Conference
San Diego KIND
San Diego Home Loan Counseling Service
San Diego Mental Health Services
San Diego Youth & Community Services
Safe Harbor Transitional Housing
Salvation Army
San Ysidro Revitalization
San Ysidro Urban Council
Sherman Heights Community Center Corporation
South Bay Consortium
Southeast Economic Development Corporation
St. Stephens Church of Christ
St. Vincent de Paul
Timberock Company
UCSD School of Architecture
Union of Pan Asian Communities
United Way of San Diego County
Urban League of San Diego, Inc.
Vietnam Vets of San Diego

Vista Hill Community Treatment Systems
Young Men's Christian Association (YMCA)
Young Women's Christian Association (YWCA)
Young Women's Christian Association (YWCA)/San Diego County

ADDENDUM 4

PUBLIC NOTICE

SAN DIEGO PUBLIC FORUM
ON THE
COMPREHENSIVE HOUSING AFFORDABILITY STRATEGY

In accordance with the National Affordable Housing Act of 1990 (P.L. 101-625), the San Diego Housing Commission is holding a Public Forum on the 5-Year Comprehensive Housing Affordability Strategy (CHAS). A CHAS is now required of any jurisdiction--including the City of San Diego--seeking funding under most federal housing programs.

The purpose of the forum is to solicit public input on the strategy. Nonprofits, government officials, tenant organizations, developers and real estate personnel, and all interested citizens are encouraged to attend one of two sessions on Wednesday, June 5th:

PUBLIC FORUM ON CHAS

Wednesday, June 5, 1991

4:00 PM Session and 6:00 PM Session

AUDITORIUM
VETERANS WAR MEMORIAL BUILDING
(Located at the north end
of the Zoo Parking Lot
in Balboa Park; Free parking
is available in the Zoo parking lot)

For further information, please call Nancy Williams, San Diego Housing Commission at 525-3609.

Printed week of May 22, 1991:
San Diego Union
The Daily Transcript
Voice & Viewpoint
La Prensa

PUBLIC NOTICE

CITY OF SAN DIEGO
Announces a
CITY COUNCIL PUBLIC HEARING
On its Draft
COMPREHENSIVE HOUSING AFFFORDABILITY STRATEGY (CHAS)

On Tuesday, October 29, 1991 the City Council will hold a public hearing on the City of San Diego's draft Comprehensive Housing Affordability Strategy (CHAS). Beginning in Federal Fiscal Year 1992, a CHAS must be submitted by all jurisdictions--including the City of San Diego--which apply to the U.S. Department of Housing and Urban Development (HUD) for direct assistance under most low and moderate-income housing programs. The public is invited to attend and speak during the October 29, 1991 hearing.

The October 29, 1991 hearing follows two public forums on CHAS (June 5th and August 21st) and a 60-day comment period (August 7th to October 7th) on the draft document. A final document is to be submitted to HUD by October 31, 1991.

City Council Public Hearing
on the City's Draft
Comprehensive Housing Affordability Strategy (CHAS)

Tuesday, October 29, 1991 at 10:00 AM

Council Committee Room
12th Floor, City Administration Building
202 C Street
San Diego, CA 92101

For further information, please call Nancy Williams, San Diego Housing Commission at 525-3609.

Printed week of October 14, 1991:
San Diego Union
La Prensa
Voice & Viewpoint
The Daily Transcript

SAN DIEGO
HOUSING COMMISSION

May 13, 1991

Dear Concerned Citizen:

The San Diego Housing Commission invites you to participate in a public forum on the Comprehensive Housing Affordability Strategy (CHAS). The forum will be held on Wednesday, June 5, 1991, at the Veterans War Memorial Building, located at the north end of the Zoo parking lot in Balboa Park (see map on reverse side). You may choose between two sessions: one beginning at 4:00 PM and the other beginning at 6:00 PM.

For your reference, a two-page summary on CHAS is attached. As the summary reflects, beginning in Federal Fiscal Year 1992, jurisdictions--including the City of San Diego--will be required to submit a 5-year CHAS to the U.S. Department of Housing and Urban Development (HUD) in order to receive assistance for federal housing programs serving very low-, low- and moderate-income families and the homeless. The deadline for submitting a CHAS to HUD for Fiscal Year 1992 is October 31, 1991.

The San Diego Housing Commission will have lead responsibility for the development of San Diego's CHAS. Citizen views concerning affordable housing strategies will be important in developing a plan for the City. Accordingly, the forum has been scheduled to solicit input from the public at the beginning of the process. In addition, there will be a 60-day public comment period on the draft document this summer prior to City Council consideration in early fall.

The CHAS is crucial to the continued development and maintenance of affordable housing opportunities in the City of San Diego. For this reason, we hope that housing advocates, developers, residents and interested citizens will participate in this public process. You can begin your participation by bringing comments on those items highlighted in the Citizen Participation Section of the attached CHAS summary to the June 5th public forum. If you cannot attend, the Commission would appreciate your cooperation in submitting a written statement.

The San Diego Housing Commission thanks you in advance for your participation. If you have any questions about the June 5th public forum or about CHAS, please feel free to contact Nancy Williams at 525-3609.

Sincerely,

Evan Becker

Evan E. Becker
Executive Director

EEB:NW/vm
Enclosure

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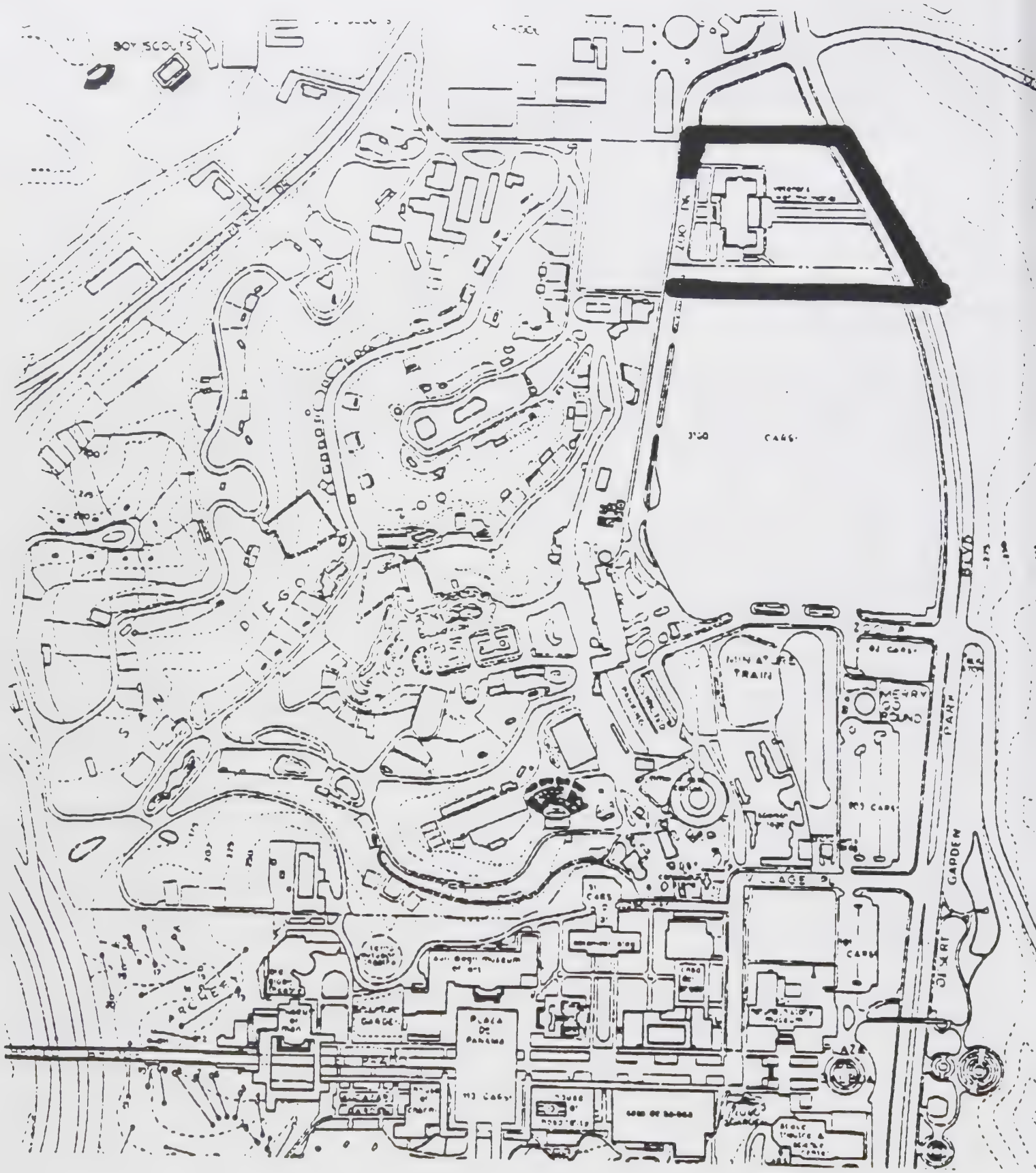

BALBOA PARK

THE VETERANS WAR MEMORIAL BUILDING IS LOCATED IN BALBOA PARK WEST OF PARK BOULEVARD. FREE PARKING IS AVAILABLE IN THE ZOO PARKING LOT.

COMPREHENSIVE HOUSING AFFORDABILITY STRATEGY (CHAS)

BACKGROUND

The National Affordable Housing Act (NAHA) was signed into law on November 28, 1990. The Act reaffirms the nation's commitment to provide all Americans with safe, decent and affordable housing.

The centerpiece of the new Act is the CHAS, a 5-year comprehensive housing affordability strategy. Beginning in Fiscal Year 1992, jurisdictions must have a HUD-approved CHAS to receive direct federal funding for housing programs. In addition, individual applicants for housing assistance funds must include, as part of their applications, certification from the relevant jurisdiction that the proposed activities are consistent with its housing strategy. The CHAS will replace both the Housing Assistance Plan (HAP) required under the Community Development Block Grant program and the Comprehensive Homeless Assistance Plan (CHAP) required under McKinney Homeless Assistance Act programs.

Existing HUD programs subject to an approved CHAS include Supportive Housing for the Disabled and the Elderly; Homeless Housing Assistance Programs, as enhanced under NAHA; and the Community Development Block Grant Program. New HUD housing programs subject to an approved CHAS include HOME, a flexible housing program that creates affordable rental and homeownership opportunities through new construction, rehabilitation, and acquisition; HOPE I (Public Housing Ownership Program), HOPE II (Homeownership for Tenants of Multi-Family Projects), HOPE III (Homeownership of Single-Family Property); and the Low-Income Housing Preservation Program (Prepayment Avoidance Incentives).

CHAS COMPONENTS

A CHAS will consist of five Parts:

I. **NEEDS ASSESSMENT:** A summary of data showing the current and projected housing needs of the homeless and of income-eligible families with housing.

II. **MARKET AND INVENTORY CONDITIONS:** A summary of market and inventory characteristics, including trends in population, household formation, and information on public and private housing stock.

III. **STRATEGIES:** A review of the needs and conditions to determine priorities for investment over the ensuing five-year period. Relevant local policies, local institutional structure and local activities to include public housing residents in management and ownership will be considered here.

IV. **RESOURCES:** A review of the various types of resources needed and anticipated to implement the strategy.

V. **IMPLEMENTATION:** This section translates available resources into goals for the number of families to be assisted in the ensuing year. It also includes certification of compliance with fair housing and relocation regulations.

CITIZEN PARTICIPATION

In preparing its CHAS, a jurisdiction must provide for citizen participation. Toward this end, it must make available to the public: information on past and anticipated funding, a proposed strategy for public review, and one or more public hearings. In addition, it must include a summary of public comments in its submitted strategy. Citizen participation is also required before CHAS amendments and annual performance reports are submitted to HUD.

While the City of San Diego can obtain most of the data required in Parts I and II of the CHAS through existing SANDAG database files, it will, where necessary, use input from the public to update those files.

Parts III, IV and V of the CHAS include several policy-related elements. These elements will be addressed by the City, using input from the public. For instance, we want to receive public input on the following:

> PART III/STRATEGIES: The impact of public policies on affordable housing.
>
> A CHAS should explain whether the cost of housing or the incentive to develop, maintain or improve affordable housing in the jurisdiction is affected by public policies, including tax policies affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits and policies that affect the return on residential investment. In addition, it should describe the jurisdiction's activities to encourage public housing residents to become more involved in housing management and homeownership.
>
> PART IV/RESOURCES: Inventory of available and needed resources.
>
> A CHAS should review the various types of resources needed and anticipated to be available to implement the strategy, including private, federal and non-federal resources.
>
> PART V/IMPLEMENTATION: Achieving annual goals and compliance certification.
>
> A CHAS should outline how planned goals and activities will be matched with resources. This section will also include compliance certification with fair housing and relocation regulations.

10 YEARS OF SERVICE

SAN DIEGO
HOUSING COMMISSION

August 13, 1991

Dear Concerned Citizen:

The San Diego Housing Commission invites you to participate in a second public forum on the Comprehensive Housing Affordability Strategy (CHAS). The forum will be held at 4:30 p.m. on Wednesday, August 21, 1991, in the Auditorium of the Veterans War Memorial Building. The Veterans War Memorial Building is located at the north end of the Zoo parking lot in Balboa Park (see Attachment I).

The San Diego Housing Commission held its first CHAS public forum on June 5th. The purpose of that forum was to provide general information to the public about CHAS. A CHAS is the document which the Federal Government is now requiring of any jurisdiction seeking direct assistance under most housing programs administered by the U.S. Department of Housing and Urban Development (HUD). In writing a CHAS, a jurisdiction must: (1) describe its affordable and homeless housing needs for a 5-year period ; (2) identify private and public resources that can be used during that time for affordable housing, homeless, and social service-related purposes; and (3) outline a strategy and an implementation plan to meet the jurisdiction's affordable housing and homeless needs.

Participation in the June 5th forum was very good. Those who attended were not only afforded an opportunity to learn about CHAS, but also had the opportunity to share their views on affordable housing/homeless needs--and a strategy to address those needs--with members of the Commission and staff.

Following the June 5th forum, Housing Commission staff drafted a CHAS, incorporating many of the comments raised on June 5th. The draft was taken to the Housing Commission on August 5th where it received approval to be released for a 60-day public comment period extending from August 7th through October 7th. A final draft of the CHAS will be presented to the City Council for consideration around the week of October 21, 1991. It will then be submitted to HUD by the designated October 31, 1991 deadline.

During the 60-day comment period, the San Diego Housing Commission will hold the second public forum on CHAS for the purpose of receiving comments on the draft document. Those of you who attended the June 5th forum received a copy of the draft in the

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mail. Anyone who did not receive a copy can gain access to one at seven public locations (see Attachment II).

It is important that the San Diego Housing Commission have your views on this important document. Therefore, we urge your attendance at the August 21, 1991 forum. If you cannot attend, please feel free to send written comments to the attention of Ms. Nancy Williams at the following address:

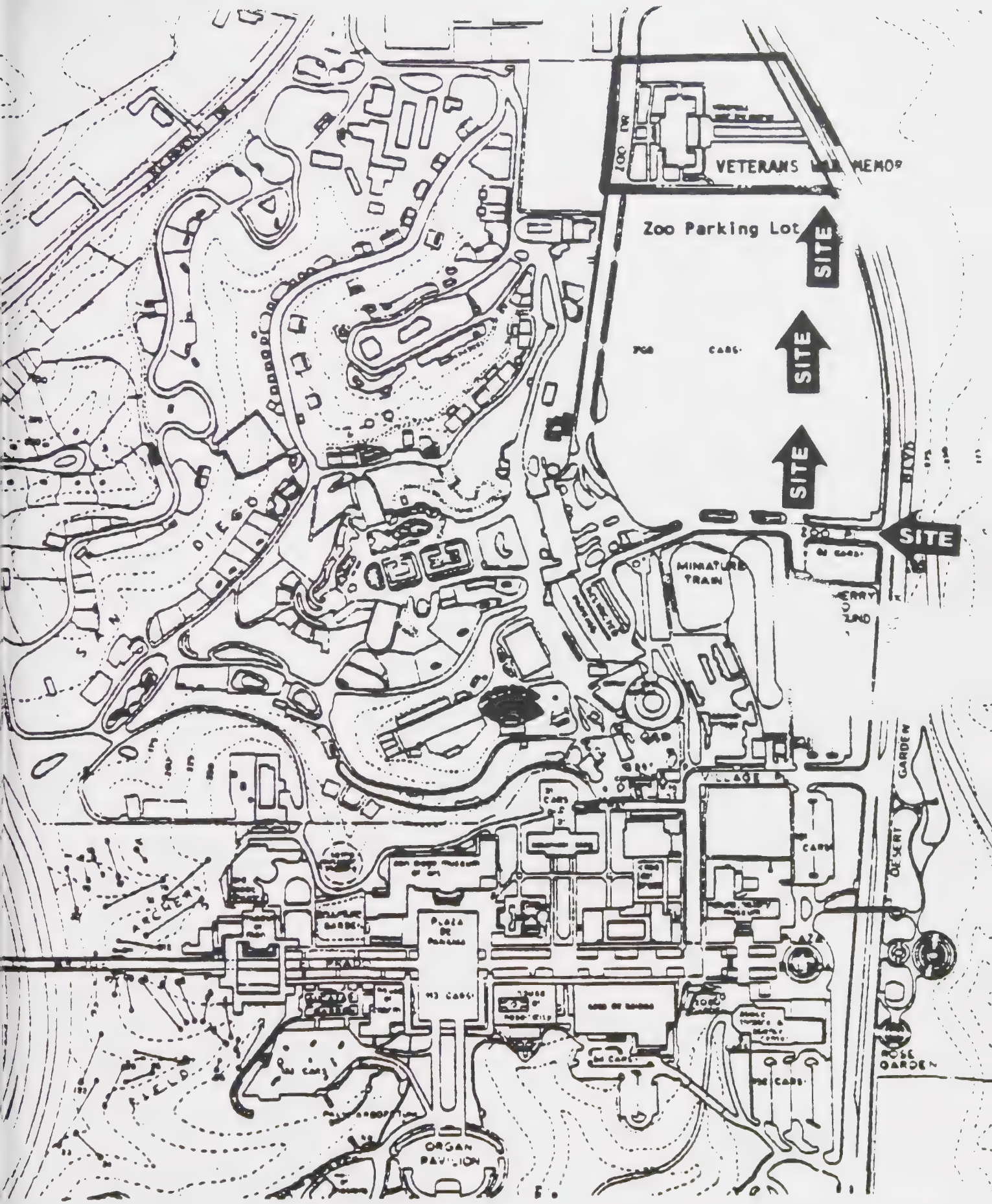
San Diego Housing Commission
1625 Newton Avenue
San Diego, CA 92113-1012

The Commission appreciates your attention to this matter, and we hope that you will be able to join us on August 21, 1991. In the meantime, if you have any questions about the CHAS, please feel free to contact Ms. Williams at 525-3609.

Sincerely,

Evan E. Becker
Executive Director

Attachments



BALBOA PARK: The Veterans War Memorial Building is located west of Park Boulevard at the north end of the Zoo Parking Lot in Balboa Park. Parking is available in the Zoo Parking Lot, and it is free.

ATTACHMENT I

ADDENDUM 6

October 7, 1991

OCT 7 1991

Nancy Williams
Program and Policy Development
San Diego Housing Commission
1625 Newton Avenue
San Diego, CA 92113-1012

Dear Ms. Williams:

The Nonprofit Federation for Housing and Community Development is a membership organization composed of nonprofit developers, bankers and other lenders, social service providers, economic development corporations, and concerned individuals in San Diego County who share a commitment to affordable housing and community-based development in the region. The Federation's specific mission is to support, assist, and facilitate nonprofit corporations in the preservation, production, and management of lower income housing. The Federation appreciates the opportunity to comment on the draft CHAS.

In general, the Federation finds many positive elements in the CHAS. The emphasis on providing housing for the very low income population and the importance attached to permanent (as opposed to temporary) solutions to the City's housing shortage are to be applauded.

The major weakness in the draft CHAS is a failure to propose specific strategies to mitigate the effects of governmental constraints on the provision of affordable housing in San Diego. The Federation believes that the Strategies section (Part 3) as currently written is too descriptive; some concrete timelines and goals should be included. These should address two fundamental problems: (1) growth in housing supply lags behind growth in population and (2) the cost of housing is growing faster income. Specific recommended strategies follow.

1. Increased Density
   Under Part 3, Section C, add:
   Community plans will be updated over the next two years with the goal of targetting increased zoning capacity which would allow more land for multi-family housing. (This strategy is mentioned in the Housing Element which recommends five updates per year.)
   The City will increase zoning capacity in nonimpacted areas near current and future transit nodes.
   Incentives will be provided for mixed use development which combines commercial and residential uses in appropriate areas.

2. Farmworker Housing
   Under Part 3, Section D:
   Specific strategies, including the ideas put forth in the draft City of San Diego Housing Element (New Construction - Programs #14) should be included to increase the supply of farmworker housing.

3. Incentives to Developers of Affordable Housing
   Under Part 3, Section C, amend language to include:
   Within two years, the City will complete a review of the policies and programs identified in the Addendum to Council Report No. 89-00CC and will implement those policies which provide incentives to developers of housing for very low and low income people.

450 B Street, Suite 1010 • San Diego, California 92101 • (619) 239-6691 FAX: (619) 239-3207

Add:

The City will aggressively pursue fee waivers, reductions, or deferrals to developers of very low and low income housing. These would require a minimum percent of very low and low income housing.

4. Handicapped

Under Part 3, Section B, add:

Handicapped - Zoning regulations of residential care facilities limit the housing choice of handicapped persons by requiring a conditional use permit for housing serving more than six handicapped persons. These regulations are in violation of the Federal Fair Housing Act, as amended in 1988, which prohibits discrimination against the handicapped in their housing choice.

Under Part 3, Section C, add:

Handicapped - The City will review its zoning regulations of residential care facilities and amend them (1) to make them consistent with the Federal Fair Housing Act and (2) to ensure that the zoning requirements are the minimum necessary to address land use issues and do not unduly restrict the availability of this housing type.

5. Shared Housing

Under Part 3, Section B, add

Shared Housing - The Zoning Code contains a number of regulations, including the Single Family Rental Overlay Zone, which limit the opportunity of unrelated persons to live together as a single housekeeping unit. Shared housing is an economical and effective means to provide decent housing at affordable rents. Zoning barriers to shared housing should be removed so that more people can benefit from this housing resource.

Under Part 3, Section C, add:

Shared Housing - The City will review the Zoning Code and amend it to remove barriers to shared housing, i. e. barriers which limit the opportunity of unrelated persons to live together as a single housekeeping unit.

6. Homeownership

Under Part 3, Section D:

The City gives priority to rental housing in the CHAS, citing the high cost of homeownership.. However, in an effort to combine the affordability of rental housing with the stability of ownership, innovative attempts to promote homeownership should be supported by the City. Community land trusts and limited equity co-operatives are two such innovative attempts and we ask the City to mention these in the CHAS and to give priority to innovative projects which include these mechanisms.

In general, the Federation agrees with the priorities which have been identified in the CHAS. However, experience has shown that there is a real need for new construction of housing which can accommodate large families. In this category of housing, there are not enough units to meet the need with rehabilitation. Please note this in the CHAS.

Thank you for your consideration of our concerns.

Sincerely,

Richard Juarez
President

CITY HEIGHTS
Community Development Corporation

October 4, 1991

San Diego Housing Commission
1625 Newton Ave.
San Diego, CA 92113-1012

Honorable Housing Commissioners:

I am writing on behalf of the Board of Directors of the City Heights Community Development Corporation, in response to your draft of the CHAS for the City of San Diego.

The City Heights Community Development Corporation (CHCDC) is a nonprofit community based organization. It was formed by and for the residents within City Heights. Its purpose is to develop and implement economic development activities such as housing development, business development, and capitol improvement; and community development activities such as clean-ups, graffiti paint-outs, and other neighborhood improvement projects.

Historically, City Heights has been a working class, single family, owner-dominated community. However, recent years have seen over-taxation of the infrastructure, unemployment, increased density, decreased owner occupancy, and poorly managed property.

The City of San Diego's Economic Development Department has established a preliminary finding of blight in City Heights, under California Redevelopment Law. This determination of blight arises chiefly from the lack of infrastructure, such as adequate schools, parks, libraries, and police and fire protection. All schools in City Heights are operating at over 300% of their capacity, with some operating at as much as 900% capacity.

While many of the rental units in City Heights are "affordable" for families at 80% of San Diego's median income, the units are in poor condition, in need of repairs, and have numerous building code violations. In addition, U.S. Census figures show overcrowding within City Heights dwelling units. Twenty five percent of City Heights dwelling units are occupied by more than one person per room, as opposed to 10.5% citywide.

Given current market conditions, low and moderate income families in City Heights are not afforded much opportunity for homeownership. Census figures show 16.7%

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of City Heights dwelling units are owner-occupied, as opposed to 48.3% citywide.

The CHCDC has determined that housing and economic development improvement in City Heights will best be addressed through increasing the quality of housing stock through rehabilitation, and through increased home ownership opportunities.

It is within this context that our comments on the CHAS are made:

1. Those who have written the CHAS have obviously spent a lot of time researching and pulling together information, and have done a good job. The information in Part 1, Part 2, Part 4 and most of Part 3 appears to be comprehensive and well thought-out.

2. The priorities for housing assistance are good. However, the strategies and implementation plans need to be more specific. In addition, it is of major concern to us that of the 1380 families you hope to assist through moderate rehab in the first year, 1300 of will be assisted through weatherization programs.

While weatherization is important, it does little to make a unit decent, safe, and sanitary, or to remove blight and upgrade the neighborhood. More emphasis should be given to upgrading units in ways other than weatherization, to make them safe and attractive, viable assets to the community.

3. City Heights has 5% of the population of the City of San Diego and approximately 9% of the subsidized housing in San Diego. We urge you to take measure to ensure that the federal money that comes to San Diego for affordable housing is used to implement the City's balanced communities policy, avoiding overconcentration of income restricted units in any one section of the city. We suggest that the CHAS give more emphasis to the development and implementation of an inclusionary housing program, including a specific timeline and goals.

4. We applaud the recognition of nonprofits as an important resource for the development of affordable housing. However, we would like to see more specific strategies showing how the city will help nonprofits in their efforts to meet the housing needs of the low and moderate income neighborhoods they serve. We urge the inclusion of specific wording showing the SDHC's increasing commitment to working with nonprofits as partners on projects or providing technical assistance as needed.

The assumption on page 66 about the involvement of for-profit developers in affordable housing projects is accurate as stated. It also applies to their involvement with nonprofits. We suggest the inclusion of language in the CHAS encouraging

incentives for the private entities to build productive ties to the nonprofit developers.

5. In the Section titled "D. Programs, Services and Initiative Strategies", innovative ways to promote homeownership, such as the formation of limited equity cooperatives and land trusts should be encouraged. Helping with the formation of co-ops and land trusts is a specific way that SDHC staff can provide technical assistance to nonprofits.

Thank you for this opportunity to comment on the draft of the CHAS. We are looking forward to working with you on our shared goal of providing affordable housing in City Heights.

Sincerely,

Carol Hartman

Carol Hartman
President

San Diego
SEDC
Southeast
Economic
Development
Corporation

OCT 4 1991

October 3, 1991

Ms. Nancy Williams
San Diego Housing Commission
1625 Newton Avenue
San Diego, CA 92113-1012

Subject: Comprehensive Housing Affordability Strategy

Dear Ms. Williams:

Thank you for sending the copy of the draft Comprehensive Housing Affordability Strategy (CHAS). We would like to commend you and the Housing Commission staff for putting together such a thorough document. The Southeast Economic Development Corporation does, however, have some issues that we feel should be addressed prior to adoption of the CHAS by the City Council.

As you are probably aware, there are a number of large residential developments within Southeast San Diego and other communities which have become havens for illegal activities. In many cases, the problems are a result of a combination of bad design and either a lack of management or improper management. Yet, the City currently does not have any programs to ensure that a management company has the expertise and experience to effectively run an apartment complex. Since this a quality of life issue for many low income residents and there is a need for property management regulations, SEDC believes that the CHAS is the appropriate forum to analyze the issue.

The draft CHAS states that the City is going to utilize its' existing housing stock in order to provide decent affordable housing. If this is true, then the focus on apartment management must extend to existing housing projects as well as new developments. Without proper management, a good proportion of the City's existing affordable housing may become unusable because of physical deterioration and the prevalence of social problems. It is essential to both the communities of the City of San Diego and the residents of the units in question that private individuals be held accountable for the decisions they make regarding apartment management.

930 Gateway Center Way • San Diego • California 92102 • (619) 236-7345 • Fax (619) 263-6912

Although adequate property management is only one key to assuring a decent quality of life for low income families, this issue deserves attention. In order to spur discussions, SEDC has developed some recommendations as to what the City policy should address. Among other things, we believe that the City needs to develop a criteria for evaluating property management firms, and the City needs to be able to prevent negligent apartment management companies from continuing to accept contracts. In terms of existing housing, the City must be able to develop a system to help property owners upgrade not only the physical quality of their property, but also the quality of property management. Education programs should be established to assist neighborhood non-profit organizations in assuming the role of property managers for some of the existing trouble projects within their communities. Most importantly, a property management policy must address the issue of continued enforcement of the conditions of the security and management plans. Again, the importance of this issue cannot be overlooked if the City desires to ensure that there is housing for low income people which is usable as well as affordable.

In the past, the Southeast Economic Development Corporation and the Housing Commission have had discussions regarding the formation of a housing management policy. We feel that the property management issue is still important and we would like to reiterate that SEDC would be more than willing to participate in any effort to develop both a policy and an implementation program for dealing with property management. We look forward to working with you and other groups in addressing this problem.

Sincerely,

Brian Fish
Planner

cc: Carolyn Smith, SEDC

J. WILLIAM COX, M.D., Ph.D.
DIRECTOR
STEVEN A. ESCOBOZA
ASSISTANT DIRECTOR

County of San Diego

DEPARTMENT OF HEALTH SERVICES
MENTAL HEALTH SERVICES

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September 30, 1991

RECEIVED
OCT - 3 1991
SAN DIEGO
HOUSING COMMISSION

Evan Becker
Executive Director
San Diego Housing Commission
1625 Newton Ave.
San Diego, CA

Dear Mr. Becker:

Overall, we highly endorse the Federal government's requirement that local housing strategies specifically address the "Supportive Housing Needs for Others with Special Needs" including persons who are mentally disabled. We appreciate and support the inclusion of these housing needs in the top three priorities of the City CHAS. Moreover, we continue to value the substantial assistance and cooperation which the Housing Commission has shown in our collaborative efforts to serve persons who are homeless and mentally ill.

The following are specific comments regarding the draft of the City of San Diego's Comprehensive Housing Affordability Strategy (dated July 29, 1991). These comments are presented in the order in which the items referenced appear in the document.

Needs Assessment

pg 6, paragraph 2: We strongly support the concept that the housing for persons with disabilities should "facilitate social communication and independence". In addition, the housing needs of persons with disabilities who require supportive services also should meet the criteria listed in this paragraph.

pg 18-19, paragraph 4: We strongly support the statement that "For those homeless who are dually-diagnosed (i.e., mentally ill and substance abuser) special treatment programs are needed."

pg 19-20, section B2: It should be noted in the description of the at-risk population that the problem of homelessness is cyclical in nature. Especially for persons who are chronically mentally ill, it is not uncommon for persons over an extended period of time to cycle back and forth between homeless and at-risk of being homeless. In order to be effective, programs targeted for the homeless population need to account for this cyclical factor.

pg 23, paragraph 5: The word "somewhat" should be deleted from the statement "...an income somewhat below the $13,600 maximum...".

Market and Inventory Conditions

pg 33, paragraph 2: We encourage any efforts by the City to: 1) streamline the land use, processing and permit procedures; and 2) to have full or partial waivers for affordable housing. Persons in the mental health community, who are interested in supported housing, frequently express frustration that these types of constraints present nearly insurmountable barriers to the development of much needed affordable, supported housing.

pg 39, section B1h: Specific services for persons in this transitional housing program are no longer being funded by San Diego County Mental Health Services.

pg 41, section C2a: In paragraph 1, it should be clarified whether this applies to services available through both the public and private sector. In paragraph 2, it should be reworded to read "San Diego County Mental Health Services" instead of "County Department of Mental Health Services" -- Mental Health Services is not a department.

Strategies

pg 44, section A2: We strongly support housing for persons with special needs (including mental disabilities) and who are very low-income (or low-income) as priorities for assistance.

pg 51, section C, New Zoning Code Advisory Committee: We recommend that this Advisory Committee specifically address the issue of special use permits, especially in regard to compliance with the intent of the Fair Housing Amendment of 1988.

pg 53-54, section D, Elderly, Small Families, and Large Families: We support giving first and second priority to persons with special needs, such as the elderly and the disabled, when they fall within the very-low income category.

Implementation

pg 84, section E: In this section, reference to continued involvement with and support of the McKinney project (noted on pg 19) should be made.

Thank you for your Commission's consideration of these comments.

Sincerely,

Areta Crowell Ph.D.

ARETA CROWELL, Ph.D.
Local Mental Health Director

cc: Kathleen Armogida
J. William Cox, M.D., Ph.D.

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Ms Nancy J. Williams

San Diego Housing Commission
1625 Newton Avenue
San Diego, CA 92113-1038

SEP - 5 1991
SAN DIEGO HOUSING COMMISSION

September 4, 1991

Re: CHAS

Dear Ms Williams:

This is in connection with previous correspondence and the CHAS draft.I was ubable to go over it in its entirety, but I do have some questions and comments. I have reviewed all the public comments and I agree with most of them, but I would like to provide some additional information on a few of them without repeating what has already been said.

Page # 10: Marguerite Ferrante on SRO's.: I agree that the HC should not participate in building expensive SRO's. I also question if it it a good idea for the commission to supply substantial funds to developers to produce high-priced SRO's. If funds are available they could better be used for building or buying SRO's, assuring that the rent is kept below $ 250.00 and in perpetuity, which otherwise is not the case. We should also remember that SRO's serve only a limited market. With the limitations funding dictates this must be kept in perspective.

Pg. # 20 - Nan DeForest's comment regarding "Median Income" is well taken. It seems to me that HUD's figures for "Median Income" are distorted and unrepresentative of the true median for the people concerned. I believe they are unrealistic because they include very high incomes in their calculations, This brings up the figure way out of proportion. This way it becomes a bonanza for landlords who frequently get subsidies beyond market rates. This definitely needs to be looked at. Do we provide subsidies to help tenants or to stuff the pockets of landlords?

The reason that the 30 % rule appears so unrealistic in San Diego has many causes. Not the least of them is the fact that we have allowed speculation on land and real estate to push up prices beyond all reason. Even though much of the damage has been done, this should be given urgent consideration. I also refer to comments of "unidentified" speaker, bottom, page # 21.

Page # 21, Comments by Myles Pomeroy: The so-called "traditional family", whether one likes it or not, is no longer as predominant as we seem to believe.

The council favors home owners because they have more clout, are voters, contribute to their campaigns and show up at hearings in greater numbers. Consideration should be given to the many single parent or single households, even though there may be legitimate reasons for some limitations in some areas tp prevent abuses.

Page # 3 CHAS: Under "resources" there is mention of $ 85 million ADDITIONAL housing assistance. Is that in addition to current Section 8 funds, and where do they come from?

Pg. # 48 CHAS: In addition to the fact that the Condominium conversion ordinance needs to be strengthened, provisions should be made to include so-named ; "Rental Condos" This is a term undoubtedly coined to circumvent conversion rules set up locally and by the State.

Pg.# 48 CHAS: re demolition: The Housing Coaltion had presented a "Home preservation" ordinance to the City Council through the TLU committee, supported by many organizations during October of 1982. This was turned down. There is really no reason for further studies. It is a matter of committment on the part of city officials. If they support the preservation of housing, to enact such an ordinace should present no problem. The ordinance proposed at the time could serve as a model.

Pg.# 49 CHAS: re Land cost: See comment re page # 20 on previous page.

Pg. # 51 CHAS: re Trust Fund: It is extremely important that this money be used where it can be most effective. It could easily be squandered on administrative costs and support of developers building market rate housing with only a small percentage of affordable housing.

Pg. # 90 CHAS: Moderate used to be from 80 -- 120 % of "Median income". This is now subdivided into "Moderate" and "Middle-Income households". What is the significance of this, and will it not lead to further confusion?

SOME GENERAL COMMENTS:

1. In connection with the above it seems important that the terms very low/low/moderate, etc. and the percentages they represent are used uniformly at all times to prevent confusion.

2.There should be a provision in the CHAS that makes it mandatory for every Housing Agency to regard the creation and preservation of low-income housing of aLL types their priority. All expenses for administration, office facilities and personnel must be kept to the absolute minimum. Because certain funds may become available, this does not mean that they can be spent on anything but housing.

3. Paragraph 91.60 2 b is very disturbing. (Rules) if HUD may not disapprove a CHAS if policies to ameliorate conditions that interfere with the production of affordable housing are not amended, the CHAS becomes a farce.

4.It is important that rental housing of quality is produced that is well designed and takes advantage of the pleasant climate of this area. This could have a positive imopact in reducing the "NIMBY" syndrome. A contest for architects to design such housing might be appropriate.

5. In order to minimize deterioration of existing housing, longer term leases need to be considered. They are predominant in eastern cities and generally work well there.Both, tenants and landlords could benefit from such an arrangement.

5. Senior CUP's should be amended to include rent restrictions.

&. Considering the great need for housing for persons earning 50 % or less of "median income", home-ownership being costly and impractical, and requiring too substantial a subsidy, rental housing should be given priority. (I was glad to note that Mr. Becker expressed agreement with this idea during a recent interview with Roger Showley.)

Attached a checklist from the MAY/JUNE edition of"Cost Cuts", an Enterprise Foundation publication. It provides some ideas regarding items that might be included in the CHAS.

Sincerely,

Encl: As per above

Actions Cities And States Can Take To Support Low-Income Housing

by Rick Cohen

The Enterprise Foundation is actively involved in a program to work with communities across the country to develop public/private partnerships for affordable housing. These partnerships consist of neighborhood nonprofit organizations, government, lenders, businesses, the philanthropic community, religious organizations and others.

Building public/private partnerships for low-income housing means increasing the capacity of the public sector as well as nonprofit developers, banks and others.

The following are checklists to assist state and local governments to understand the roles they can play and the incentives they can provide to effectively support the production of low-income housing.

Checklist For States

State governments have become increasingly major players in strengthening the low-income housing delivery system. Partnerships at the state level exist in Wisconsin and Massachusetts, among others, where government contributes more than a symbolic blessing to low-income housing. Even without the formality of a public/private partnership, there are many positive roles for state government support of low-income housing, depending on a state's fiscal circumstances and specific housing needs.

The following list provides examples of the kinds of actions states can initiate to increase their supply of low-income housing:

✔ Make direct state appropriations for low-income housing.

✔ Dedicate revenue streams (such as real estate transfer taxes or mortgage recording fees) for low-income housing activity.

✔ Use nontraditional revenue sources (such as interest on real estate escrow accounts, earnings from escheat and fiduciary funds, bond refinancings, and other sources).

✔ Issue general obligation (GO) bonds as well as mortgage revenue bonds (MRB) for low-income housing.

✔ Allocate state income tax credits to corporations that donate land to nonprofits for housing.

✔ Create a state land bank combining state lands and private lands for affordable housing development.

✔ Deposit state funds in financial institutions with strong Community Reinvestment Act (CRA) ratings and track records of providing concessionary financing to nonprofit developers.

✔ Create a lending consortium at the state level.

✔ Review state building codes to remove unnecessary requirements that add burdensome costs to low-income housing.

✔ Authorize by state law the creation of local housing trust funds, housing linkage programs, and inclusionary zoning.

✔ Make group homes for foster children, the developmentally disabled, and the mentally ill as-of-right land uses in all residential zones.

✔ Create special programs to fund the construction or rehabilitation of group homes, single-room-occupancy (SRO) housing, transitional housing for the homeless, etc., in addition to affordable family housing.

✔ Provide funding for nonprofits and limited equity cooperatives to acquire and manage HUD-foreclosed multifamily properties (Section 236 and Section 221(d)(3) projects).

✔ Monitor and intervene in federally subsidized multifamily projects whose affordability is threatened by expiring affordability controls.

✔ Restrict condominium conversions where the result would be untenable losses of affordable rental housing units.

✔ Create a receivership law permitting localities to take and designate managers for private properties whose landlords consistently fail to provide basic services and maintenance.

✔ Strengthen state tenant protection laws against unwarranted evictions and harassment.

✔ Enact and enforce a state fair housing law to prevent discrimination in housing sales and rentals.

✔ Require low-income housing "givebacks" from market rate commercial and residential developers receiving state-authorized tax abatements and exemptions.

✔ Facilitate state-level interagency coordination on low-income housing, particularly between state housing finance agencies and state departments of community affairs.

✔ Create a state ombudsman for nonprofit organizations.

✔ Require suburban communities to provide land use and other incentives for their fair shares of the state's low-income housing needs.

Checklist For Cities

Municipal governments are closer to the scene of low-income housing development and therefore can play many more supportive roles to encourage production. Depending on local circumstances, here is what City Hall can do to help low-income housing developers:

✔ Use municipal revenues to pay the costs of infrastructure (water, sewer, roads, etc.) for low-income housing projects.

✔ Create a housing linkage program where real estate market conditions warrant one.

✔ Link deposits of city funds to banks with strong Community Reinvestment Act ratings and track records of supporting nonprofit developers.

✔ Dedicate Urban Development Action Grant (UDAG) "payback" funds and Community Development Block Grant (CDBG) income to low-income housing.

✔ Capitalize a housing trust fund with municipal appropriations or dedicated revenue streams (real estate transfer fees, hotel occupancy taxes, linkage fees, etc.).

✔ Use tax increment financing (TIF) from market rate redevelopment projects for low-income housing.

✔ Allocate a higher proportion of the CDBG budget to low-income housing activity.

✔ Use CDBG "float loans" and Section 108 loans to support low-income housing development.

✔ Provide nonprofits with operating and administrative funding support.

✔ "Bank" city-owned, tax-foreclosed properties for low-income housing and transfer them to nonprofits for nominal consideration.

✔ Assist nonprofit organizations to acquire surplus corporate and church lands for low-income housing.

✔ Use redevelopment powers such as eminent domain to assemble low-income development sites.

✔ Support the conversion of occupied, city-owned, multifamily properties to tenant-owned limited equity co-ops.

✔ Designate nonprofits as receivers of properties owned by landlords who consistently violate the housing code.

✔ Use the public housing authority (PHA) and local nonprofit organizations to acquire federally subsidized projects facing expiring affordability controls or severe fiscal and management problems.

✔ Expedite the processing of planning approvals and building permits for low-income housing development.

✔ Waive all building permit and site plan application fees for low-income housing.

✔ Exempt low-income housing from infrastructure impact fees and growth controls.

✔ Permit density bonuses for low-income housing.

✔ Permit the creation of group homes as as-of-right land uses in all residential zones without imposing conditional or exceptional use restrictions and procedures.

✔ Mandate inclusionary zoning for developments above a specified threshold size.

✔ Rezone excess commercial and industrial lands in the community for low-income housing.

✔ Use zoning techniques such as zero-lot line zoning, clustering, reduced setback requirements, etc. to facilitate low-income housing development.

✔ Allow for shared housing and accessory apartments.

✔ Take active measures to protect and preserve SROs, group homes, and other low-income housing resources.

✔ Actively support and package efforts to use federal Low-Income Housing Tax Credits and historic preservation tax credits for affordable housing projects.

✔ Issue mortgage revenue bonds.

✔ Review building code requirements for excessive cost burdens on low-income housing.

✔ Provide municipal tax abatement for low-income housing on an as-of-right basis.

✔ Use city funds to provide soft second mortgages for low-income housing development.

✔ Support and fund programs for credit counseling and homeowner skill training for low-income households.

✔ Actively encourage the housing development capacity of nonprofit neighborhood groups.

These lists are not comprehensive. Rather, they are starting points for governmental agencies and local advocates to think through ideas to advance the participation of the public sector in low-income housing development.

For more information on how to effectively support public/private partnerships and the production of low-income housing, check out the following:

Mary K. Nenno and George Colyer, *New Money & New Methods: A Catalog of State and Local Initiatives in Housing and Community Development* (Washington, D.C.: National Association of Housing and Redevelopment Officials, 1988).

Mary K. Nenno and George Colyer, *New State and Local Initiatives in Housing and Community Development: What Do They Mean for the Future?* (Washington, D.C.: National Association of Housing and Redevelopment Officials, 1988).

John Sidor, *State Housing Initiatives: The 1988 Compendium* (Washington, D.C.: Council of State Community Affairs Agencies, 1988).

Michael A. Stegman and J. David Hulchanski, *Municipal Housing Programs: How States and Localities Are Responding to Federal Cutbacks in Low Income Housing* (Washington, D.C.: Urban Land Institute, 1987).

Eileen Brettler Berenyi, *Locally Funded Housing Programs in the United States: A Survey of the 51 Most Populated Cities* (New York: New School for Social Research, July, 1989).

Michael Cantamessa Ballin and James R. Merling, "Innovative Subsidies of State and Local Housing Programs," Real Estate Finance Journal (Winter, 1987).

Fannie Mae, *Fannie Mae's Low- and Moderate-Income Housing Initiatives* (Washington, D.C.: Fannie Mae, December, 1988).

James Pickman, Benson F. Roberts, Mindy Leiterman, Robert N. Mittle, *Producing Lower Income Housing: Local Initiatives* (Washington, D.C.: Bureau of National Affairs, 1986).

David C. Schwartz, Richard C. Ferlauto, Daniel H. Hoffman, *A New Housing Policy for America: Recapturing the American Dream* (Philadelphia: Temple University Press, 1988).

JIM VARNADORE

SUGGESTED CHANGES TO THE SAN DIEGO
COMPREHENSIVE HOUSING AFFORDABILITY STRATEGY DOCUMENT
August 21, 1991

PAGE	COMMENT
2 + 3	Re-write to reflect changes which come into the document.
5	Next-to-last paragraph, first line - 66,962 should read 76,204
22	Top paragraph - CSCD is the correct abbreviation.
24	Top two paragraphs and footnote - eliminate personal names.
25	Bottom paragraph - change 1/18 to read 349.
26	Top paragraph and footnote - delete personal name.
28 + 29	Both of these pages can profitably be replaced with a series of maps highlighting the census tracts involved in each case.
33	Bottom paragraph - re-write to indicate that the city DOES expect trouble with these at-risk units. You say as much on page 43.
33	Bottom paragraph - Only 43 of the 48 at-risk apartment complexes are shown. Suggest we show them all. Also suggest we put them into a column, in order of the expected year of loss.
34	Paragraph 4 - omit entirely. Not needed, not helpful and not correct.
45	Convert block 1I to priority 1. Convert blocks 2A-2E to priority 3. Convert block 3H to priority 1. Convert blocks 5H, 5I to priority 1. Convert block 6I to priority 2. Convert blocks 7B, 7C, 7E to priority 3. Convert blocks 8H, 8I to priority 1. Convert block 10A to priority 2. Convert blocks 10H, 10I to priority 1.

PAGE	COMMENT
74 - 84	These will need extensive re-write as we change the prior sections of the CHAS.
86 + 87	May we combine these two letters into one letter?
93	Add "Savings Association Home Loan Counseling Center".
	Make "Neighborhood House" into Neighborhood House Association".
	Expand a little on "St. Vincent de Paul". He's been dead several centuries now.
	Should "Catholic Community Services" be included?
94 - 105	Probably should leave these out of the strategy. No need to re-print federal regulations.

varnadore

Comments on CHAS

1)page 4-line 5-5000 families to receive housing assistance. This statement is misleading as it includes 1300 that get weatherization. See page 77. The 5000 relates to the charts on pages 76 and 77. How many of the 1470 units in column on page 76 are mod rehab? ~~Sixxx~~ Why do we think we will get this number?

2)page 5-It is not true that Table 1A is from 1990 census data.

3)My inspection of the SANDAG figures which are the source of Table 1A compute 85,000 verylow income households, not 81,505 as stated

3)What ~~iy~~ the source of the number 6066 overcrowded households? It can't be the 1990 census as these figures have not been released.

4)page 6-"expected to add 17,520 new housing units for low income ~~i~~ households". What is the source of this figure?What Table shows this ? Actual FY 90-327 units. FY 91-533.

5)page 7-Table 1A-SANDAG used wrong methodology to compute number of VLI households. 42,136 is doubtful since SANDAG gave us a figure of 50,000 for 1986. All these figures should be refigured.

6)page 7-line 13,column 2-43,740 is incorrect. So is 68,202 on line 21.

7)page 12-How many of the homeless farm workers are in the city of San Diego?

8)page 31-par.2-the figure of 202,619 dwelling units is wrong. All of these ~~g~~ figures should be changed. See correct number on page 32.

9)page 51-Removing negative effects of public policies. Where are these strategies? All I see is appointing committees. The City Council enacted these negative effects. Why should we expect them to remove them? The worst policy is the exclusionary zoning which is reinforced by their ~~xxxxxxxxxxxx~~ Protected Single Family Neighborhood ordinance. Where is the ~~xxx~~ protection for multi-family?A clear case of Apartheid. Don't let the have-nots live near the haves.

Comments on CHAS-page 2

10)page 57-"the Commission's efforts have resulted in more than 14,000 affordable housing units throughtout the City." This is misleading since half of these units are Section 8, which HUD gives the City. It also counts rehab which has no rent limits.

11) pages 70 and 71 line 55-doesnt add across

12)page 79-Can't believe the wait for small families is 1-2 years. Not with 25,000 families on the waiting list.

JIM VARNADORE

SOME PROPOSED STRATEGY ELEMENTS FOR THE COMPREHENSIVE HOUSING AFFORDABILITY STRATEGY (CHAS)

Many strategy elements are available to be adopted into the CHAS, and they promote housing affordability. This draft identifies some of these elements which, taken together, form acceptable strategies.

STRATEGY ELEMENTS TO PROMOTE VERY-LOW-INCOME HOUSING

1. Adopt and enforce a low-income and very-low-income inclusionary policy for all newly constructed housing of every kind.

2. In areas where water and sewer systems are in place, eliminate connection fees for new apartments that agree to charge less than 50% of median rates for similar size units. Adopt lifeline rates for these utilities similar to other lifeline rates.

3. Exempt from any future growth management restrictions, all new apartments that charge 50% or less of the median rate for similar size units.

4. Amend zoning ordinances and decisions to increase the density of selected parcels on which new apartments are built that agree to rent for less than the median rate charged for similar size units. Use this technique to increase the amount of affordable land by at least 5% per year.

5. Reduce processing fees and eliminate impact fees for new rental apartments that agree to charge less than 50% of the median rental rate for similar size units, whenever such units are built in areas with existing city services and infrastructure.

6. Together with low-income and very-low-income renters, review and revise development, construction and other standards for rental apartments to reduce costs and remove unneeded requirements and unwanted amenities. Together with developers, very-low-income and low-income renters and housing advocates, reduce public facility requirement standards for affordable housing.

7. Minimize demolition of affordable housing by requiring a unit-for-unit replacement of demolished units within one year of the issuance of a demolition permit. Replacement units need not be built on the demolished site, but must be built in some part of the city. Rental rates for replacements must not exceed 150% of the average rent charged for the demolished unit during the most recent twelve months that the unit was actually rented.

8. Facilitate construction of affordable rental units by requiring each community plan to have specific enforceable provisions to take an equitable portion of the city's fair share of low-income and very-low-income households. Require community plans to identify specific sites on which to place this housing.

9. Urge the state to relax the strictures of Article 34 of the constitution which inhibits the development of affordable housing.

10. Focus all acquisition of public rental apartments upon purchase of existing projects rather than building new units, unless the actual cost per unit to bring existing units on line exceeds 75% of the expected cost for building comparable units.

11. Enforce accelerated plan review, EIR review and permit issuance procedures for projects where twenty percent or more of the units are reserved for low-income and very-low-income occupants. Use community EIR's as master EIR's for individual projects, and limit supplemental environmental review to those effects, including off-site impacts and cumulative impacts, that are peculiar to a project and were not deemed significant in the community EIR.

12. Provide support to non-profit corporations which develop affordable housing. Offer technical training and assistance to increase the capacity for housing development and give financial assistance directly for housing development.

13. Pool public and private funds to assist non-profit corporations to buy properties owned by the RTC and other foreclosed properties.

14. Use every resource and technique to prevent loss of low-income units through expiration of subsidies or mortgage guarantees.

15. Promote non-traditional housing such as mixed income or mixed use housing, projects without parking in fully urban aareas, multi-generational housing, co-housing, live-work housing, housing near transit facilities, and other unusual projects which attract a wide range of persons.

16. Establish a no-cost tenant training school to teach low-income and very-low-income renters about the rights and responsibilities of tenancy. Arrange some tangible reward for attendance such as spreading security deposit payments over several months or offering small rent reductions, etc.

ADDITIONAL STRATEGY ELEMENTS TO PROMOTE LOW-INCOME HOUSING

17. In areas where water and sewer systems are in place, reduce connection fees for new apartments that charge between 50 and 100% of median rates for similar size units. Adopt modified lifeline rates for water and sewer similar to lifeline rates for other utilities.

18. Develop incentives to promote new rental apartments with rates between 50% and 100% of median rates charged on comparable units.

19. Abandon the present policy of reducing density on merged plots and adopt a policy of increasing their density. Increase density on all plots formed by merger after December 31, 1986. Abandon the present policy of forced plot mergers.

20. Reduce impact and processing fees on new rental apartments that agree to charge between 50 and 100% of the median rental rate for similar size units, whenever such units are built in areas having existing city services and infrastructure.

STRATEGY ELEMENTS TO PROMOTE OTHER AFFORDABLE RENTAL HOUSING

21. Amend companion unit (granny flat) regulations to encourage greater development and use of these units. Specifically eliminate the rule that companion units adjoin main buildings and the rule that companion units be occupied by family members.

22. Bring zoning ordinances and decisions affecting to group homes into conformity with the Federal Fair Housing Amendments Act, and encourage the wider availability of group homes to persons who are advantaged by such a living arrangement.

23. Expand and promote the use of Small Lot Overlay zoning as a device to reduce land cost and promote home ownership for moderate income households.

24. Eliminate all SFROZ's and all reserved parking from residential areas.

25. Establish a task force under the leadership of the San Diego Resident Relations Foundation to develop a program of information and relocation assistance to renters being evicted for non-payment of rent. Include very-low-income and low-income renters as well as local housing, fair housing and affordable housing agencies on the task force.

A SET OF STRATEGY ELEMENTS
FOR HOME OWNERSHIP

26. Without interfering in any fiduciary obligation, encourage all public agencies to deposit funds with lenders who place a higher than average percent of their mortgage funds in mortgage-deficient areas. Encourage local pension funds to follow this example or to use part of their funds to create a small secondary mortgage market to purchase loans placed on affordable projects.

27. Strengthen all first-time homebuyer programs with home loan counseling, credit counseling, local services counseling, etc. Establish financial and technical assistance programs to help with purchase, rehabilitation or modernization of these homes.

28. Together with low-income and very-low-income individuals, review and revise development, construction and other standards for new homes of all types, to reduce costs and abate unneeded requirements and unwanted amenities. Together with developers, low-income and very-low-income individuals and housing advocates, review and reduce public facility requirements for affordable housing.

29. Build small sets of no-frill condominiums throughout the city and finance them by a lottery. One unit per quarter might be the initial offering rate, then one per month and finally one unit per week as the program matures. Establish controls to require owner occupancy, prevent conversion to cash, maintain affordability, enhance community balance, avoid abusing the program and tilt toward low-income and very-low-income individuals.

30. Establish an inclusionary program which puts affordable owner-occupied housing into every commercial construction program. Such housing might be integral to the commercial project or located at sites chosen by the city during the negotiations for the commercial project. This housing would not be restricted to persons employed at the project, but that should be emphasized.

Bank of America

National City Branch
235 East Eighth Street
National City, CA 92050

READER DISTRIBUTION
File
Ex Dir

June 13, 1991

JUN 17 1991

Mr. Evan E. Becker
Executive Director
San Diego Housing Commission
1625 Newton Avenue
San Diego, CA 92113-1038

Subject: Comprehensive Housing Affordable Strategy (CHAS) Resource - Bank of America

Bank of America last month set a goal of at least $5 billion in housing and community development loans for low-and moderate-income communities in California over the next 10 years.

This goal is an expression of our long-term commitment to meet the credit needs of communities in all income levels in California.

Bank of America has also made it a goal to achieve and maintain an "outstanding" rating for CRA programs at all its domestic banking subsidiaries.

The $5 billion goal comes on the heels of a year in which community reinvestment programs at Bank of America achieved two notable "firsts." In October, the federal Office of the Comptroller of the Currency rated the bank's CRA programs "outstanding" - the highest of four possible grades under the government's new public rating system.

And, at the end of 1990, Bank of America reported it had done a total of $555 million in community reinvestment-related business for the year--a jump of 63% over the previous year.

The large volume of CRA activity of Bank of America in 1990 was driven by Neighborhood Advantage, a new mortgage product aimed at lower-income census tracts throughout California. Neighborhood Advantage relaxes some qualifying and underwriting criteria to make it easier for first-time and lower-income homebuyers to get into the market.

In 1990, Bank of America CRA-related activity included:

* $468.7 million home loans in low-income census tracts (Neighborhood Advantage).
* $38.4 million in FHA and VA home mortgages.
* $21.9 million in financing for construction, bridge and takeout financing of low-income housing.
* $1.1 million in housing rehabilitation loans under the City Improvement and Restoration Program.
* $5.7 million in personal, auto and home equity loans under our BASIC program, which provides modified underwriting criteria for personal consumer loans.
* $2.3 million in home improvement and mobile home loans under the BASIC program.
* $1.1 million in Farmers Home Administration loans.
* $900,000 for commercial rehabilitation loans under the City Improvement and Restoration Program.
* $1.6 million for participation in the California Community Reinvestment Corp., which constructs and rehabilitates low-income housing.
* $14.4 million in Small Business Administration loans.

Should you require further information regarding Bank of America's commitment to the community, please don't hesitate to ask.

Sincerely,

Darwin Weidauer
Vice President/Manager
(619) 230-5632

DW:cs:6013f

Melvin Shapiro

1050 Essex Street #201
San Diego, CA 92103-3304

June 12, 1991

Nancy Williams
S.D. Housing Commission
1625 Newton Ave.
San Diego, Ca 92113

Dear Ms. Williams,

This letter follows up our phone conversation about the CHAS. I am submitting a partial list of "relevant publicpolicies" as defined in the Federal Register #91.15-d of February 1991.

I understand that our planning department will submit these policies to you but I have a feeling that Planning will be reluctant to cite policies that are responsible for negative effects on affordable housing.

Some of these policies are:

1)Condominium Conversion ordinance-this makes it very easy for owners to convert.

2)Demolition-there is no restriction on demolishing affordable housing.

3)Multi-family design regulations-1990 amendments make building more expensive. Ordinances #101.0410, 101.0713, 101.0835.

4)Increased fees on multi-family construction

5)Restrictions on rental of single family houses which limit the number of people that can occupy the houses. Ordinance #17652 enacted June 1991.

6)Reducing densities-probably the most important obstacle to affordable housing.The history of downzoning has a long history going back to the 1970's. The R-4 zone which allowed densities up to 108 per acre was practically eliminated. A recent planning department report (enclosed) shows the most recent rash of downzoning results in a potential loss of 7653 units.

I suggest you try to get the complete history of reduced densities in the inner city.

Sincerely,

Melvin Shapiro

The Municipal Court
SAN DIEGO JUDICIAL DISTRICT
COUNTY COURTHOUSE
220 W BROADWAY
SAN DIEGO, CA 92101

ROBERT C. COATES
JUDGE

June 4, 1991

MEMORANDUM

TO: Members, San Diego Housing Commission

FROM: Judge Robert C. Coates

SUBJECT: Priorities, For Use of Federal Entitlement Housing Funds (CHAS)

Dear Commissioners:

You have asked for my advice on uses of Federal housing monies locally - how to get the "biggest bang" of real solutions to our local housing crisis, from the federal monies involved.

This paper contains three sections:

1. Preconditions to solutions;
2. Present local needs: homeless and near-homeless; recommended strategies; and
3. Principles which should inform all actions in the low-income housing arena.

A. PRECONDITIONS TO SOLUTION

1. Exact quantification, not of "goals", but instead, of needs. These need, also, to be examined within a regional (SANDAG?) framework, since as they are examined against employment, transportation and other regional concerns, housing needs "pop up into bold relief" (to quote former CCDC Director Patrick Kruer).

2. Creation of an easy-to-understand ten-year plan with responsibility clearly placed --- which is then committed to by statute by the City Council and other bodies involved, amid public fanfare and public education.

1 Our local difficulties are, of course, symptomatic of the national low-income housing crisis which features a deficit now exceeding 1.5 million low-income housing dwelling and which deficit is now increasing by 1/3 million units per year. The American curve, in this regard, is plunging downward - but many tested and proven local strategies exist. I have outlined many of these in the attached chapter from, A STREET IS NOT A HOME - Solving America's Homeless Dilemma.

3. Create a public aura of excitement and competition around the subject of low-income housing -- and how this great city (along with Seattle and some others) might lead the nation back to a national solution. Do this, via architectural competitions (participated in by an enthusiastic (where the City Council could promise actions -- to permit construction of creative models, suspend certain code sections, etc.), funding lending competitions for low-income housing (using H.U.D. -- and possibly via a HUD Grant and the "point system" which is built into the Federal Code S&L Bailout provisions), some cooperative, incentive-funding of neighborhood development corporations, etc.

B. PRESENT LOCAL NEEDS -- HOMELESS AND NEAR-HOMELESS

1. Our shelter systems are more-than-rudimentary, but do need some continual support, augmentation and "cheer-leading", but are, basically, "on their feet". We have 7 emergency shelters (673 beds plus 100 seasonal beds), 7 transitional living programs (266 beds) and 10 programs serving special populations (170 beds), citywide. Episcopal Community Services (ECS) operates the Nu Hotel for parolees (60 beds) and 4 transitional programs for women and youth (72 beds); Church of Gospel Ministry's Emmanuel House serves those over 18 years of age (23 beds); St. Vincent de Paul operates two emergency facilities with a combined bed space of 325, plus Joshua House for AIDS clients (8 beds) and a transitional with space for 45 singles or families; Salvation Army offers emergency shelter for 105; S.D. Rescue Mission has emergency bed space for 114 and transitional space for 135; the U.S. Mission has 35 beds and the House of Rachel has emergency space for 11; the YWCA offers 14 beds in their Women In Transition program and 30 spaces for youth in Casa de Paz; Project Safehouse has space for 9 women; S.D. Youth & Community Services offers four youth programs with a total bed space of 40; up to 18 Vietnam Veterans can be housed through project Dust Off; 5 Veterans can be housed through FIA (Forgotten in America); and, the Landing Zone, slated to open in Fall, 1991, will accommodate more than 60 single men, women and children.

For your information and for purposes of comparison, the countywide figures are:

16 Emergency Shelters
14 Transitional Programs
18 Programs serving Special populations

1,596 beds plus another 100 seasonal beds.

Small, matching grants, here will be put to great effect by these competent staff.

Alertness, also, will continue to yield new players. Recent examples include the County Mental Health Department, outlying church congregations, service clubs, foundations -- to patch together new shelter techniques and funding.

2. I believe that the biggest present need, however, is for supportive, transitional housing -- the next logical step for a person ... out of a homeless shelter before they can get into traditional, market "low income housing".

Transitional housing is peculiarly apt for application of the collaborative approaches outlined in my chapter. Here, smaller, matching grants (and highly-competent technical assistance which the Housing Commission can offer) can be critical, and can get huge "bangs for one's buck".

The key slogan here (after "collaboration" and "teamwork") is "HEART AND SOUL". "Human support systems" is a bureaucratic phrase to cover some of this. But the key really is simple, old fashioned human commodities built into (and paid for in transitional housing projects: Human heart and soul. Relationship. Warmth. Suppport. Community. Love. Care. Continuity! Today, this costs money. It must be planned for, insisted on, paid for and tested out.

Transitional housing never works in today's America without this as a CENTRAL INGREDIENT.

You need to fund this!

And you need to help explain and sell it to leaders and the populace.

C. PRINCIPLES:

1. A FACT: With supportive human services, low income housing "works" and is ultimately a wonderful, welcomed addition to all neighborhoods.

(Please see the film on this subject by the California Housing and Homeless Coalition, regarding the MIMBY phenomenon -- get this from the Regional Task Force on the Homeless, 239-4800). Build these services into all projects.

2. Collaborate. Build Teams. Spread the expense and the work and the responsibility. Build with proven, long-lasting institutions (city, college, Catholic Community Services, METRO, ECS, City of San Diego, San Diego Community Foundation, etc.).

Low income housing is today built because resources from several sources come together -- in a City where the City Council is committed to "running interference" for all projects.

3. Once the Council announces its plan, announces its united front and announces that fairness will reign (that is, that all sectors of the city will bear an equal load) while unwanted neighborhood side effects will be mitigated -- opposition diminishes, that the housing will be made to enhance neighborhoods ... opposition does evaporate.

4. The Mayor and Council must courageously lead. This is the sine qua non.

5. A world-class team of grant writers needs to be assembled, to follow the example of those assembled by Seattle Mayor Charles T. Royer in the early 1980's. Stitching together funds from private industry sources, local and regional foundations, State and federal grants, service clubs funding, lent money, etc. -- Royer's team "made off" with more than 10% of all of the McKinney Act's first year funds for "homeless projects".

   Our San Diego team should be equally brilliant and opportunistic -and should work, hand in glove with teams of local, elected officials and private sector leaders, under the direction of the Housing Commission.

5. Many proven strategies exist (see attached book chapter). Why not try to get maximum impact from the mostly likely strategies ... but try a wide range of them simultaneously?

Respectfully submitted,

ROBERT C. COATES, JUDGE

RCC/plb
Enclosure

San Diego
Community
Foundation

Nancy:

Please make below comments available to participants in CHAS Forum. Unavoidably, I'm in Los Angeles during the session.

1. Every creative attempt should be made to comply with the "matching" requirement. Dollars can be found to match federal funds. A willingness and process are needed.

2. Housing Act funds shouldn't simply replace current federal program dollars. This is true of State involvement also.

3. LOW-income people and neighborhoods should be key targets within the CHAS.

4. There should be annual hearing to guage performance. Community groups should participate in preparing annual reports.

5. CHAS should be "living" document unlike Housing Assistance Plans which became meaningless.

Clarence J. Elliott, Jr.
Community Development Project Director

San Diego Trust & Savings Bank
San Diego, California

JEFFREY A. STONE
VICE PRESIDENT

May 29, 1991

Evan E. Becker
Executive Director
San Diego Housing Commission
1625 Newton Avenue
San Diego, California 92113-1038

Dear Evan:

Thank you for your invitation to attend the public forum on the Comprehensive Housing Affordability Strategy on June 5th. While I hope to be in attendance at the forum, I though I would forward some suggested language for inclusion in the CHAS, which describe the services provided by The Neighborhood Housing Service organization, that fit within the criteria outlined by HUD. As a Board member of the San Diego Neighborhood Housing Service, Inc., I know that you are already very familiar with the local chapter's programs to promote affordable housing in the City Heights area. However, I thought this broader description of available NHS services, that appeared in our national publication, would be helpful to your CHAS process.

If you have any questions, please do not hesitate to give me a call. I am looking forward to seeing you on June 5th.

Sincerely,

Jeffrey A. Stone
Real Estate Loan Services
950 Sixth Avenue, Suite #300
San Diego, CA 92101
(619) 238-4897

cc: J. Ridley

JAS/mjm

,uggested Language for Inclusion in CHASs

[illegible] and state agen[illegible] g the CHAS will be working with a [illegible] system under deadline pressure [illegible] NeighborWorks organization [illegible] helpful by describing their strategies as clearly and concisely as possible. Below is sample language that describes some of the core services offered by NeighborWorks organizations. Be sure to mention whether you serve very low-income, low-income, or moderate-income persons.

evolving Loan Fund

The NeighborWorks organization, a 501(c)3 nonprofit organization, establishes and maintains a apital Projects and Revolving Loan und to:

- make loans to residents in target eighborhoods who want to purchase d, or improve their homes but no cannot be served by local financial institutions or public agencies
- make loans to owners of residential rental or mixed commercial or sidential properties in order to eserve or provide long-term affordable rental housing for low- and oderate-income occupants
- acquire, construct or rehabilitate operties consistent with the eighborWorks neighborhood vitalization purposes

Management of the loan fund is by volunteer partnership committee, t the day-to-day project-specific sts are usually met through local ndraising and have been partially pported through CDBG grants.

utual Housing

The Mutual Housing Association, a (c)3 nonprofit organization, is a ogram to develop, own, and man- housing in the public interest. e Association offers a form of ten- that provides its resident mem- s both the privilege of life-occu- ncy and a quality home at an af- dable cost. The resident members re in both the cost of the produc- through a one-time membership and in the maintenance and man- ment responsibilities.

Apartment Improvement Program

[illegible] neighborhood-based partnership [illegible] corporation whose board/committee [illegible] work to improve the multi- [illegible] housing in the neighborhood in a way which benefits existing lower-income residents.

Leadership Development

A program to increase the number [illegible] resident leaders participating in neighborhood management and to [illegible] the skills of existing residents to assure long-term neighborhood stability. This is usually accomplished through workshops and through volunteer projects such as paint programs and crime watches.

Community Outreach and Education

A program to identify recipients of services and to offer training in any one of a number of targeted areas, e.g., weatherization, home maintenance, and credit counseling. This is usually done through neighborhood-based workshops and one-on-one training.

Rental Rehabilitation and Property Management

A program that includes the acquisition, rehab, and management of rental units owned by a NeighborWorks organization or a subsidiary, for the benefit of very low-income and/or low-income residents.

Infill Housing

A program to alleviate neighborhood vacant lot problems and address residential real estate development by providing new construction or move-on housing units on scattered sites throughout NeighborWorks neighborhoods.

Rehab and Sale

A program to purchase and rehabilitate primarily vacant and blighted residential properties to eliminate their negative impact in the neighborhood [illegible] sell the properties to [illegible] ownership.

Neighborhood Commercial Development

A program designed to assure the viability of commercial districts by strengthening small businesses, improving the physical environment of the area, and providing additional goods, services and employment for very low-income and low-income members of the community. The program revitalizes businesses in target neighborhoods by providing organizational support, business counseling and loan packaging.

Commercial and Economic Development Strategies

Commercial Loan Program (CLP): A program to encourage small-business development or the rehabilitation of commercial property in the neighborhood target area by providing gap financing.

Neighborhood Enterprise Center (NEC): A program to facilitate development of micro- business or self-employment ventures within disadvantaged populations, particularly among minorities and women. The NEC program provides small loans, peer group support and educational assistance to entrepreneurs.

Strategic Commercial Investment Program (SCIP): A program to facilitate the development of a key commercial or mixed-use property which would have a dramatic revitalizing impact on the neighborhood and would spur additional development in the target area.

Energy Conservation Services

A program to promote energy savings for property owners and tenants through counseling, incorporating energy audits into sensitive code enforcement, building energy conservation [illegible] and work write-ups and assist [illegible] investments in insulation and other energy conservation measures.

Paint Program

A program to [illegible] neighborhood housing through special paint loans or grants or contributed materials and volunteers' time.

Home Ownership Promotion

A program to increase the number of owner-occupied units through the use of neighborhood marketing strategies intended, in part, to convert neighborhood tenants into neighborhood homeowners. Home Owners Promotion offers pre-purchase counseling, rehab assistance and financing options.

CHAS

Continued from page [illegible]

count of what actual strategies will be used and the number of families who will be assisted. Current HUD regulations and the act itself focus on affordable housing production through public-private partnerships, but do not clearly include many NeighborWorks core services.

The CHAS replaces the Housing Assistance Plan (HAP) and the Comprehensive Housing Assistance Plan (CHAP) under the McKinney Act, as well as other programs, including Section 312 loans; HoDAGs; Nehemiah Housing grants; and rental rehabilitation, Section 8 mod-rehab, and urban homesteading funds.

The act also creates new affordable housing programs, the National Homeownership Trust, and allocates funds to state and local governments

Postoffice Box 16472
San Diego CA 92176
May 28, 1991

San Diego Housing Commission
1625 Newton Avenue
San Diego CA 92113

Ladies and Gentlemen,

There are many good ideas to be included in the Comprehensive Housing Affordability Strategy. I hope and expect that they will all be offered during public comment. Three are important enough to deserve written mention, and they are the basis for this letter.

Despite the gentle hint in Mr. Becker's letter of May 13, that public comment confine itself to CHAS components III through V, one idea applies to component II, and it is important enough to come first. I think we agree that we must choose and use the best data available to support the CHAS. The very best data on the costs of rental housing come from the local newspaper, yet that source is often deliberately snubbed by government employees. The Commission staff members who draft the CHAS should be required to take rental housing cost data from the local want ads and should be forbidden to rely on data which are generalized from surveys of any kind, or which come from companies who sell information. Those sources are unfortunately insinuated with bias or inadequate technique or both. At very minimum, their data cannot be independently verified and worse, the data are rather often slanted. We must be skeptical of all data from every source other than the newspaper, including data from SANDAG, to be sure the data are accurate, verifiable and appropriate to the intended use.

The staff might object, saying that the want ads provide only raw data, requiring much labor to reduce them to manageable form. I disagree in advance. I often reduce rental cost data from the Sunday want ads to manageable form in 3 to 5 hours. That is not too long a period to spend to get good data. Moreover, if that burden is too onerous, the staff can arrange with a nearby college to reduce the data in a computer statistical package. Several such packages are installed locally. The Social Science Research Lab at SDSU, for instance, has such a package which the staff might be able to use at no cost, especially during the summer vacation. If push comes to shove, I am willing to do the job myself, at no cost, to be sure accurate, verifiable rental cost data are used.

The second idea which deserves written mention is one which cuts across CHAS components III through V. It is that we adopt only strategies and programs which directly affect affordability and avoid any interference from other kinds of goals. We should not, for instance, confuse affordability with different but similar concepts like equal opportunity or equal access or fair housing or affirmative marketing. We should also not mix urban diversity or neighborhood diversity or financial set-asides or other integration tactics with the CHAS. The CHAS deserves to be considered on its merits. We should pursue those other ideas as valuable in their own right, certainly, but we should not let them get in the way of an affordability strategy. To confuse the two kinds of things will only interfere with the laudable purposes for having CHAS.

The third idea is to ensure that the CHAS is consonant with and has been coordinated with the City's Housing Element. The Housing Element is to be published out shortly and is the version which must be re-issued each five years as part of the City's general plan. We should be sure that CHAS and the Housing Element fit snugly together, even to the point of changing both the CHAS draft and the Housing Element draft where needed to assure a good fit. We should not miss this opportunity to do a careful job which produces two well coordinated documents.

As always, my advice and assistance are yours for the asking. As always, you will get good advice and helpful assistance. As always, I emphasize actually doing something for affordability, and as always, I urge doing it for the sake of our ordinary citizens.

Sincerely,

James Varnadore

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

24 CFR Part 91

[Docket No. R-91-1507; FR-2932-I-01]

RIN 2501-AB13

Comprehensive Housing Affordability Strategies

AGENCY: Office of the Secretary, HUD.

ACTION: Interim rule and request for comments.

SUMMARY: President Bush signed the Cranston-Gonzalez National Affordable Housing Act on November 28, 1990. The Act affirms the national goal that every American family be able to afford decent housing in a safe and livable neighborhood. Among the new housing programs the Act created to assist State and local governments achieve this national housing policy are the HOME Investment Partnerships (created by title II of the Act) and the HOPE programs (created by titles IV, V and VIII of the Act). The centerpiece to these new programs, as well as to management of existing programs, is the Act's requirement that State and local governments must have Comprehensive Housing Affordability Strategies. This rule implements section 105 of the Act, which prescribes the development of these housing strategies, as well as sections 107 and 108, which prescribe the citizen participation procedure for development of the housing strategies and the compliance procedures to be followed by State and local governments.

DATES: Effective date: March 6, 1991. Comments must be received by May 6, 1991. Those sections of this rule that contain information collection requirements (§§ 91.15, 91.20, 91.25, 91.30, 91.35, 91.40, 91.45, 91.50, 91.55, 91.70, and 91.75) will not become effective until the Office of Management and Budget has approved the information collection requirements and a separate notice of that fact has been published by the Department in the **Federal Register**.

ADDRESSES: Interested persons are invited to submit comments regarding this rule to the Rules Docket Clerk, Office of the General Counsel, room 10276, Department of Housing and Urban Development, 451 Seventh Street SW., Washington, DC 20410. Communications should refer to the above docket number and title. A copy of each communication submitted will be available for public inspection between 7:30 a.m. and 5:30 p.m. at the above address. Note that comments on the information collection requirements contained in the rule should also be forwarded to the Office of Management and Budget's Office of Information and Regulatory Affairs, New Executive Office Building, room 3001, Washington, DC 20303, Attention: Wendy Sherwin, Desk Officer for HUD.

As a convenience to commenters, the Rules Docket Clerk will accept brief public comments transmitted by facsimile ("FAX") machine. The telephone number of the FAX receiver is (202) 708-4337. (This is not a toll-free number.) Only public comments of six or fewer *total* pages will be accepted via FAX transmittal. This limitation is necessary in order to assure reasonable access to the equipment. Comments sent by FAX in excess of six pages will *not* be accepted. Receipt of FAX transmittals will not be acknowledged, except that the sender may call the Rules Docket Clerk at (202) 708-2084 to confirm receipt.

FOR FURTHER INFORMATION CONTACT: David Cohen, Director, Office of Urban Rehabilitation, Office of Community Planning and Development, 451 Seventh Street SW., Washington, DC 20410, telephone (202) 708-2685.

SUPPLEMENTARY INFORMATION:

I. Information Collections

The information collection requirements contained in §§ 91.15, 91.20, 91.25, 91.30, 91.35, 91.40, 91.45, 91.50, 91.55, 91.70, and 91.75 of this rule have been submitted to the Office of Management and Budget (OMB) for expedited review under the Paperwork Reduction Act of 1980. When these collections have been approved, a Notice will be published to that effect in the **Federal Register**. Until that time no person may be subjected to a penalty for failure to comply with these information collection requirements.

The annual public reporting burden of these requirements, including the time for reviewing the instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information, is stated in the chart included under the heading of Findings and Certifications. We note that much of the data to be used by State and local governments to comply with the requirements of this rule is available from the Census Bureau, and that HUD will supply the jurisdictions with the relevant portions of that data, as well as with data on the HUD-assisted housing inventory, minimizing the burden on the jurisdictions. Send comments regarding burden estimates or any other aspect of these collections of information, including suggestions for reducing the burden, to the Department of Housing and Urban Development Rules Docket Clerk, at the address stated above, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, room 3001, Washington, DC 20503, Attention: Wendy Sherwin, Desk Officer for HUD. At the end of the public comment period on this rule, the Department may amend the information collection requirements set out in this rule to reflect public comments or OMB comments received concerning the information collections.

II. Background

Since Fiscal Year 1975, the Department has required the preparation of a local housing planning document as a condition to receipt of certain types of funding to local governments. First, a Housing Assistance Plan (HAP) was required under the Community Development Block Grant Program (and used in connection with assisted housing programs). Then when the Stuart B. McKinney Homeless Assistance Act was enacted, a Comprehensive Homeless Assistance Plan (CHAP) was required as a condition of approval of funding for a locality's program to provide shelter for homeless persons. Now the Cranston-Gonzalez National Affordable Housing Act (Cranston-Gonzalez Act or the Act) has created a new planning document for use by States as well as units of general local government—the Comprehensive Housing Affordability Strategy (CHAS or housing strategy). This CHAS incorporates useful elements of the HAP and CHAP, and it will eventually replace both of them. Inclusion of all housing related elements in a single planning document will make the resulting document a more useful tool for addressing housing needs. Instead of dealing with a specific funding source, the housing strategy will create the impetus for a jurisdiction to examine its housing needs in a holistic way, establish goals, and develop a plan for carrying out those activities.

The housing strategy will serve as an action-oriented management tool for States and local governments. It will also serve as a monitoring tool for HUD to determine how effectively a jurisdiction is satisfying the needs identified within available resources. In its CHAS, a State or local government will estimate the housing assistance needs of its very low-income, low-income, and moderate income families, including the needs of homeless individuals and families, and will assess

the availability of unassisted housing, assisted housing, and other resources for addressing these needs. On the basis of this information, the jurisdiction will develop a strategy for meeting these housing assistance needs over the next five years. Each year, the jurisdiction will decide how the available resources will be used to provide affordable housing for needy families.

The Comprehensive Housing Affordability Strategy document will consist of five components, each with tabular summaries and supporting narrative, that integrate the fifteen statutory items described in more detail in this rule. (References below to paragraphs are to the lettered paragraphs of both §§ 91.15 and 91.20, unless otherwise noted.) Beginning in FY 1993 (October 1, 1992), HUD will provide special tabulations of decennial census data from the U.S. Census Bureau as the basis for the tabular summaries of need and market and inventory conditions integral to the first two components. The community may accept and submit this information as is, or may present its own updated estimates in a format at least as detailed, in accordance with standards prescribed by HUD. (Detailed statistics will be optional for the 1991 and 1992 CHAS submissions, but jurisdictions will be responsible for providing estimates of need and market conditions on which to base the rest of the CHAS.) In addition, HUD will provide to jurisdictions, to the extent feasible, data on the HUD-assisted housing stock.

—The first part, the *Needs Assessment*, (corresponding to paragraphs a and b) will summarize available data on the current needs of the homeless and of income-eligible families with housing. Jurisdictions are required to project those needs for the ensuing five-year period.

—Part two, *Market and Inventory Conditions*, will summarize local market and inventory characteristics, including trends in population, household formation, and housing (paragraph c). Information on the assisted housing and the public housing stock (§ 91.15(i)) will also be presented here.

—The third part, *Strategies*, will integrate the review of needs and conditions in a structured format, to determine priorities for investment over the ensuing five-year period (paragraph b). The relevant local policies (and State policies) (paragraph d), local institutional structure (paragraph e), and local activities to involve public housing residents in management and ownership (paragraph j) will be considered.

—Part four, *Resources*, will review the various types of resources needed and anticipated to be available to implement the strategy (including resources for homelessness, paragraph b), including the private, Federal, and non-Federal public resources (paragraph f) and plans for coordination (paragraph h) and use of the Low-Income Housing Tax Credit (§ 91.20(i)). The summary table will show the dollars anticipated from each Federal program over the coming year, and indicate the State/local resources available to meet matching requirements for different types of uses.

—The final part, *Implementation*, translates the five-year strategy and the available resources into plans (paragraph g) and goals (paragraph n) for the number of families to be assisted in the ensuing year, including the number of the provided affordable housing as defined in the HOME Program (paragraph n) with the resources identified in the fourth part. It will also cover specifics of the plans for assisting the homeless (called for in paragraph b), and include monitoring details and certifications regarding fair housing and relocation (paragraphs k, l, and m).

The Act requires that, in order to receive funding under certain HUD programs, a State or unit of general local government must have a Comprehensive Housing Affordability Strategy that has been approved by HUD for a fiscal year. In addition, for certain other programs, the Act requires that an application include a certification of consistency of the proposal with an approved housing strategy for the jurisdiction in which the proposed project will be located. [All Section numbers stated throughout this Preamble relate to the Cranston-Gonzalez Act, unless otherwise noted.]

For FY 1991 funding, a certification is necessary for applications for the Supportive Housing for Persons with Disabilities Program, authorized under Section 811 of the Act (to be a new CFR part 890), for the Supportive Housing for the Elderly Program, authorized under section 202 of the Housing Act of 1959 (to be a new part 889), and for the HOME Program (Sec. 215)—if funding becomes available this year.

With respect to many of the programs for which a certification of consistency is required, HUD has the discretion to continue using other planning documents for a period of time. The Department is exercising its authority to provide for a transition from the current planning documents (CHAP or HAP) until October 31, 1991, so that jurisdictions need not submit a housing strategy before October 1991 for the following programs: Homeless Housing Assistance, such as Emergency Shelter Grants (ESG) (part 576); Transitional Housing (part 577), Permanent Housing for Handicapped Homeless (part 578), Supplemental Assistance for Facilities to Assist the Homeless (part 579), and Single Room Occupancy for the Homeless (part 882, subpart H); Community Development Block Grants (CDBG, including Entitlements, Small cities, States, and Special Purpose) (part 570); HOPE I, II and III Homeownership Programs (Secs. 411, *et seq.*; 421, *et seq.*; and 441, *et seq.*, respectively); Low-Income Housing Preservation (prepayment avoidance incentives, Section 601); Shelter Plus Care (Sec 837); and Housing Opportunities for Persons with AIDS (Sec. 854).

Public Housing and Indian Housing funding and section 8 assistance, generally, are not dependent on existence of, or certification of consistency with, an approved housing strategy for the jurisdiction. Programs that refer to the housing strategy, but do not require a certification of consistency with it, are the section 8 Program—as one basis for determination of exception rents and allocation of funding (Secs. 543(b) and 556), and the Family Self-Sufficiency Program (section 554) for determination of when a public housing agency is not required to operate that type of program. In addition, as a homeless assistance program, the section 8 Moderate Rehabilitation Single Room Occupancy is dependent on it (Sec. 441, McKinney Act).

Indian Tribes are not included in the Act's definition of a "jurisdiction", the entity charged with submitting a CHAS. The Department has concluded that they need not submit a housing strategy, and need not submit a certification of consistency with a housing strategy. Therefore, there is no mention of Indian Tribes in the rule itself. The Indian CDBG Program, authorized by section 106 of the Housing and Community Development Act of 1974, the HOPE I Program, authorized by section 411 of this Act, and the HOPE III Program, authorized by section 441 of the Act, permit participation of Indian Tribes and Indian Housing Authorities, and those programs refer to certification of compliance with an approved housing strategy. However, the Department believes that, given the sovereign status of Indian Tribes, it would be inappropriate for a State to be deemed the "appropriate" jurisdiction to apply

its housing strategy to programs administered by Indian Tribes.

III. Purpose of the Cranston-Gonzalez Act

The purposes of the Act, as stated in section 103 of the Cranston-Gonzalez Act, are the following:

(1) to help families not owning a home to save for a downpayment for the purchase of a home;

(2) to retain wherever feasible as housing affordable to low-income families those dwelling units produced for such purpose with Federal assistance;

(3) to extend and strengthen partnerships among all levels of government and the private sector, including for-profit and non-profit organizations, in the production and operation of housing affordable to low-income and moderate-income families;

(4) to expand and improve Federal rental assistance for very low-income families; and

(5) to increase the supply of supportive housing, which combines structural features and services needed to enable persons with special needs to live with dignity and independence.

This rule's goal is to promote those purposes by requiring the preparation of a single planning document that encompasses a jurisdiction's housing needs, with a focus on affordable housing for low-income families. The objectives to be promoted through this planning process are to preserve affordable housing units developed with Federal assistance; to produce housing for low-income and moderate-income families through private-public partnerships; to expand the availability of rental assistance for very low-income families; to increase the supply of supportive housing; and to help families aspiring to become first-time homebuyers.

IV. Monitoring

As part of its housing strategy, each jurisdiction must provide information on the standards and procedures it will use to monitor recipients of assistance for compliance with contractual requirements and applicable regulations. Each jurisdiction will also report annually to HUD on the progress made in implementing its housing strategy. The Department believes that monitoring is a critical component in the long-term success of the programs covered. As part of its monitoring responsibilities, the Department will be looking at both the standards and procedures provided by the jurisdictions, as well as how well they are being carried out. Because of the importance of these activities, the Department is seeking public comment on what additional requirements, if any, would be useful.

V. Transition

In accordance with section 105(a), the Secretary has determined that Comprehensive Housing Affordability Strategies generally will first be submitted for Federal Fiscal Year 1992. The submissions will be due on October 31, 1991, to cover the period of October 1, 1991 through September 30, 1992. Housing strategies submitted by October 31, 1991 will be approved by December 30, 1991, if they are complete and are consistent with the purposes of the Act. If HUD finds that there are deficiencies in the CHAS, it could take up to an additional five months to correct these deficiencies. Funding decisions made after a strategy is approved will depend on the approved CHAS (perhaps as early as January 1992, for strategies submitted by October 31, 1991). Since funds may be made available for Fiscal Year 1992 early in calendar year 1992, it will be to a jurisdiction's benefit to start the process as early as possible, so that an approved CHAS will be in place when funding availability is announced.

The purpose of publishing this rule in early 1991 as an interim rule is to permit jurisdictions to know, at the earliest possible time, what may be required of them no later than early 1992. Most programs will require the submission of a CHAS or certification of compliance with a CHAS by October 31, 1991. The development of a CHAS, including solicitation of citizen comments in a public hearing process, is expected to take at least six months. To be able to gear up to perform these tasks, many jurisdictions will need significant additional time, particularly if they have never before prepared such documents (such as several of the States).

In addition, there are two principal types of circumstances that would warrant submission of a housing strategy before October 1991: an application for funds under the HOME program, if Federal Fiscal Year 1991 funding becomes available for that program, or an application for FY 1991 funding under the Supportive Housing for the Elderly (Section 202 of the 1959 Act) or Supportive Housing for Persons with Disabilities (Section 811) Programs, which require a certification of consistency with an approved housing strategy. In either of these cases, the period to which the housing strategy applies should be greater than a 12-month period, starting from the date of submission and running through September 30, 1992.

If funds become available for the HOME Program in FY 1991 and a formula allocation is published, jurisdictions that want to participate will have only 30 days to notify the Department of their interest in participating, and only 90 days thereafter to submit a housing strategy. Unlike some other programs created by the Cranston-Gonzalez Act, there is no other planning document that is authorized to be substituted for the housing strategy in the HOME program.

Since funding during FY 1991 of the Supportive Housing Programs depends on certification of compliance with an approved housing strategy, that document must be submitted before the generally applicable submission date—in time to be approved as part of the funding award process. If funding is not available for the HOME Program when applications are solicited for the Supportive Housing Programs, and there is no State CHAS, then an abbreviated strategy may be submitted under § 91.25. In FY 1991, the abbreviated strategy may be the approved HAP for that jurisdiction or, if there is no approved HAP, an identification of needs of elderly persons or persons with disabilities, as appropriate, and a strategy to meet those needs.

It should also be pointed out that the applicant for funding may not always be a State or local government, responsible for submitting a CHAS. In the case of Supportive Housing for the Elderly or Persons with Disabilities, an application for funding will be submitted by a nonprofit corporation, which would have to obtain a certification from the State or local government that its application is consistent with the CHAS. If the jurisdiction does not anticipate applying for other forms of assistance for which approval of a CHAS is necessary, it must submit a housing strategy to enable applications for Supportive Housing for the Elderly or Persons with Disabilities to be funded in the jurisdiction. In such a case, the local jurisdiction will be permitted to submit an abbreviated housing strategy, with which it can certify the proposed project is consistent. (For FY 1991, the abbreviated strategy can be as described in the previous paragraph.)

This problem may not arise after fiscal year 1992, when States will, doubtless, have approved housing strategies. At that point, the applicant should seek certification of consistency with the approved strategy of the lowest level of government that has one. (If State and local governments do not submit housing strategies, they may, in effect deprive their jurisdictions of funding for such programs.)

In some cases, States and localities now have their own housing strategies.

If, at the time a jurisdiction first submits a CHAS, whether for 1991 or 1992, it already has its own housing strategy that contains most of the elements required under this rule, it may comply with the CHAS requirements by submitting a modified version of its own strategy. With its strategy, the jurisdiction must supply information about the location of the HUD-required elements, supplemented with information required by HUD that is not included in its own strategy. In addition, this submission, including the supplement, must be prepared in compliance with the citizen participation requirements of this rule.

Since the Department recognizes that the CHAS imposes new requirements, it expects the first year or two to be a time for capacity building. In the first year, HUD will accept data already obtained by jurisdictions, delaying until October 1992 strict compliance with the requirement for detailed statistical presentation of household needs and market conditions. During the second year, HUD will work with jurisdictions on developing their CHAS, providing them with census data appropriate for the CHAS as soon as possible. It also will provide information developed by the Secretary's Task Force on Affordable Housing, which will be useful in determining the effects of public policy on affordable housing. Any data other than that from the U.S. Decennial Census that is used for the CHAS must conform with HUD standards, to be specified in administrative instructions.

VI. Possible Changes in the Final Rule

HUD plans to publish a final rule on this subject matter, with full attention to the public comments received, within twelve months of the publication date of today's document. One possible change in the rule on which the Department would like public comment is the addition to the Strategy for a State (§ 91.20) of an element similar to the public housing stock element of the Strategy for a Unit of General Local Government (§ 91.15), to encourage the States to take a stronger role in preserving and improving the public housing stock. The new element would require the State to describe the number of public housing units in the State and in each of the geographic subdivisions about which it provides data, the condition of those units, the restoration and revitalization needs of the public housing projects in these areas, as well as the State's strategy to contribute to the improvement of the management and operation of these projects and to the improvement of the living environment of low- and very low-income families residing in public housing.

VII. Amendments to Existing Regulations

As discussed above, the requirement for a certification of consistency with the jurisdiction's housing strategy is a requirement added by the Act to programs that are now operational. As part of this rulemaking procedure, the regulations for those programs must be amended to reflect this change. Accordingly, parts 570, 576, 577, 578, 579 and subpart H of 882 will be modified in a technical rule to promptly follow this rule's publication, to reflect the new requirement for certification.

Findings and Certifications

Environmental Review. A Finding of No Significant Impact with respect to the environment has been made in accordance with HUD regulations at 24 CFR part 50 that implement section 102(2)(C) of the National Environmental Policy Act of 1969. The Finding of No Significant Impact is available for public inspection between 7:30 a.m. and 5:30 p.m. weekdays in the office of the Rules Docket Clerk at the above address.

Impact on the Economy. This rule does not constitute a "major rule" as that term is defined in section 1(d) of the Executive Order on Federal Regulations issued by the President on February 17, 1981. An analysis of the rule indicates that it does not: (1) Have an annual effect on the economy of $100 million or more; (2) cause a major increase in costs or prices for consumers, individual industries, Federal, State, or local government agencies, or geographic regions; or (3) have a significant adverse effect on competition, employment, investment, productivity, innovation, or on the ability of United States-based enterprises to compete with foreign-based enterprises in domestic or export markets.

Impact on Small Entities. In accordance with the Regulatory Flexibility Act (5 U.S.C. 605(b)), the undersigned hereby certifies that this rule does not have a significant economic impact on a substantial number of small entities, since it requires only the minimum burden required by the Act in the way of a planning document. To the extent that a small entity might be involved in a single HUD-funded activity, it might be able to submit an abbreviated housing strategy, in accordance with § 91.25. This minimizes the impact, to the extent possible, of the Act's requirements.

Regulatory Agenda. This rule was not listed in the Department's Semiannual Agenda of Regulations published on October 29, 1990 (55 FR 44530) pursuant to Executive Order 12291 and the Regulatory Flexibility Act.

Information Collection Requirements. The information collection requirements contained in this rule have been submitted to OMB for review under section 3504(h) of the Paperwork Reduction Act of 1980. Information on the public reporting burden of the provisions of this rule that the Department has determined contain information collection requirements is provided as follows:

ANNUAL REPORTING BURDEN; INTERIM RULE—COMPREHENSIVE HOUSING AFFORDABILITY STRATEGY

Description	Respondents	Annual hrs.	Hourly rate	Annual cost
Complete Submission (every 5 years)				
CHAS (§§ 91.15, 91.20, 91.25, 91.30, 91.35, 91.55, 91.70)	1,078	240	$15.00	$3,880,800
Citizen participation (§§ 91.40, 91.45, 91.50)	1,078	[1] 8	15.00	129,360
Publication cost (§ 91.40(b))	1,078		[2] 100.00	107,800
Performance Report (§ 91.75)	1,078	40	15.00	646,800
Total Annual Cost to Jurisdictions				4,764,760
Annual Updates (following 4 years)				
CHAS	1,078	80	$15.00	$1,293,600
Citizen participation	1,078	[1] 8	15.00	129,360
Publication Costs	1,078		[2] 100.00	107,800

ANNUAL REPORTING BURDEN; INTERIM RULE—COMPREHENSIVE HOUSING AFFORDABILITY STRATEGY—Continued

Description	Respondents	Annual hrs.	Hourly rate	Annual cost
Performance Report				
Total Annual Cost to Jurisdictions	1,078	40	15.00	646,800
				2,177,560

[1] It is anticipated that jurisdictions that are CDBG recipients will hold their CHAS public hearings in conjunction with their CDBG public hearings.
[2] Per year.

Federalism Impact. The General Counsel, as the Designated Official under section 6(a) of Executive Order 12612, *Federalism*, has determined that this rule will not have substantial direct effects on States or their political subdivisions, on the relationship between the Federal government and the States, or on the distribution of power and responsibilities among the various levels of government, since it simply carries out a statutory mandate for States and localities to document their need for HUD housing assistance and to evaluate their success. The planning and assessment mechanism established by statute and implemented in this rule is substituted for ones currently required in several HUD programs. States and localities still retain the authority to develop their own goals. Both the statute and the rule provide that a decison by a State or locality to pursue policies that may adversely affect housing affordability may not be used as a basis for HUD disapproval of a housing strategy. Since the relationships are not disturbed, the rule is not subject to review under the Order.

Impact on the Family. The General Counsel, as the Designated Official under Executive Order 12606, *The Family*, has determined that this rule does not have potential for significant impact on family formation, maintenace, and general well-being, and, thus, is not subject to review under the Order.

Justification for an Interim Rule. In general, the Department publishes a rule for public comment before issuing a rule for effect, in accordance with its own rule on rulemaking, 24 CFR part 10. However, part 10 does provide for exceptions from that general rule where the agency finds good cause to omit advance notice and public participation. The good cause requirement is satisfied when prior public procedure is "impracticable, unnecessary, or contrary to the public interest." 24 CFR 10.1. The Department finds that good cause exists to publish this rule for effect without first soliciting public comment, in that prior public procedure is impracticable and contrary to the public interest.

In this case, the housing strategy document is needed no later than April of 1991 so that funding of such programs as Supportive Housing for the Elderly and Supportive Housing for the Disabled will be able to take place as scheduled in June of 1991. Moreover, if FY 1991 funding is made available for the HOME Program, the CHAS will be required to be submitted by Summer of 1991 for that program. In order to submit a housing strategy to HUD, a jurisdiction is likely to need about six months, including time to conduct the required public hearings. With the usual procedure of publication of a proposed rule for comment before development and publication of a final rule that responds to the comments, a rule would not be effective soon enough to allow for submissions by Summer of 1991. Thus, delay to obtain public comments would effectively deny applicants the ability to receive funding for these programs in 1991. Therefore, it is impracticable and contrary to the public interest to delay publication of an effective rule implementing the Comprehensive Housing Affordability Strategy portion of the Act until public comments were received, analyzed and the rule revised.

The immediate need for the rule may not affect every jurisdiction during FY 1991, e.g., if an application for funding of a Supportive Housing project is not submitted and the jurisdiction does not qualify for or choose to submit an application for funding under the HOME Program. To the extent that the rule does not affect a jurisdiction, its issuance for effect will be harmless.

This housing strategy rule will eventually affect most participants in HUD programs. Consequently, the Department has decided to solicit public comment and to prepare a final rule based on consideration of comments received. Some jurisdictions will prepare housing strategies during 1991 and will be able to contribute the benefit of experience under this rule in their comments. The final rule will take effect for submissions due in October 1992 and thereafter.

List of Subjects in 24 CFR Part 91

Grant programs—housing and community development, Reporting and recordkeeping requirements, Homeless.

Accordingly, a new part 91 is added to subtitle A of title 24 of the Code of Federal Regulations, to read as follows:

PART 91—STATE AND LOCAL HOUSING AFFORDABILITY STRATEGIES

Subpart A—General

Sec.
91.1 Purpose and applicability.
91.5 Definitions.
91.10 Review by courts.

Subpart B—Contents of Strategy

91.15 Strategy for a unit of general local goverment.
91.20 Strategy for a State.
91.25 Abbreviated Strategy.

Subpart C—Coordination and Consultation

91.30 Coordination of State and local housing strategies.
91.35 Consultation with social service agencies.

Subpart D—Citizen Participation

91.40 Preparation of housing strategy.
91.45 Substantial amendment to housing strategy or submission of performance report.
91.50 Resolution of citizen complaints.

Subpart E—HUD Review and Approval

91.55 Submission of housing strategy.
91.60 Approval of a strategy.
91.65 Actions in case of disapproval of a strategy.
91.70 Amendment and resubmission of a housing strategy.

Subpart F—Performance Reports and Reviews

91.75 Performance reports.
91.80 HUD performance reviews.

Subpart G—Miscellaneous

91.99 Waiver authority.

Authority: Secs. 101–108, Cranston-Gonzalez National Affordable Housing Act, Pub. L. 101–625, 104 Stat. 4079 (42 U.S.C. 12701–12708); 42 U.S.C. 3535(d).

Subpart A—General

§ 91.1 Purpose and applicability.

(a) *Purpose.*

(1) *Housing strategy.* The purpose of the State and local housing affordability strategy is to assure that jurisdictions receiving HUD assistance plan for the housing and related needs of very low-income, low-income, and moderate-income families in their jurisdictions in a way that improves the availability and affordability of decent, safe, and sanitary housing in a suitable living environment, including housing for

persons needing supportive services, using private resources as well as governmental ones, and including both homeownership and rental options. It is this comprehensive housing affordability strategy document, and the associated certification and monitoring procedures, which assures that the purposes of the Cranston-Gonzalez National Affordable Housing Act are carried out under various programs administered by HUD.

(2) *The Act.* The purposes of the Cranston-Gonzalez National Affordable Housing Act (hereafter, the Act) are the following:

(i) To help families not owning a home to save for a downpayment for the purchase of a home;

(ii) To retain, wherever feasible, as housing affordable to low-income families, those dwelling units produced for such purpose with Federal assistance;

(iii) To extend and strengthen partnerships among all levels of government and the private sector, including for-profit and nonprofit organizations, in the production and operation of housing affordable to low-income and moderate-income families;

(iv) To expand and improve Federal rental assistance for very low-income families; and

(v) To increase the supply of supportive housing, which combines structural features and services needed to enable persons with special needs to live with dignity and independence.

(b) *Applicability.*

(1) *General.*

(i) In order to receive funding under certain HUD programs, a State or unit of general local government must have a Comprehensive Housing Affordability Strategy (CHAS or housing strategy) that has been approved by HUD. This housing strategy initially includes estimates for a five-year period. It must be updated every year, with a complete submission generally due every five years, as described in § 91.55(b).

(ii) In certain HUD programs, an applicant must submit a certification that the proposed housing activity is consistent with the approved housing strategy for the jurisdiction in which the proposed project will be located. In the case of an applicant other than a jurisdiction that seeks HUD funding, the certification must be obtained from the lowest level of government that has an approved housing strategy. For example, if a local government does not have an approved housing strategy, a non-profit organization seeking to build Supportive Housing for the Elderly may obtain certification from the State of consistency of the project with the State's approved housing strategy.

(2) *Programs covered.* Proposed housing activities to be funded under the following programs will be approved by HUD only if there is a certification of consistency with an approved housing strategy covering the jurisdiction in which the housing is to be located. (Under some of these programs there are transition provisions, delaying the effective date of their reliance on the CHAS—check the regulations for the individual programs.):

(i) The HOME Program (Title II of the Act);

(ii) The HOPE I (Public Housing Homeownership) Program (Secs. 411–419 of the Act, adding Title III to the United States Housing Act of 1937);

(iii) The HOPE II Program (Homeownership of Multifamily Units) (Secs. 421–431 of the Act);

(iv) The HOPE III Program (Homeownership of Single Family Homes) (Secs. 441–448 of the Act);

(v) The Low-Income Housing Preservation Program (prepayment avoidance incentives, Secs. 601–613, creating the Low-Income Preservation and Resident Homeownership Act of 1990);

(vi) The Shelter Plus Care Program (Secs. 451–484 of the Stewart B. McKinney Homeless Assistance Act, as amended by Sec. 837 of the Act);

(vii) The Housing Opportunities Program for Persons with AIDS (Secs. 851–863 of the Act);

(viii) The Supportive Housing for the Elderly Program (Sec. 202 of the Housing Act of 1959, as amended by Sec. 801 of the Act; 24 CFR part 889);

(ix) The Supportive Housing for Persons with Disabilities Program (Sec. 811 of the Act, 24 CFR part 890);

(x) The Homeless Housing Assistance Programs (Secs. 411–443 of the Stewart B. McKinney Homeless Assistance Act; see 24 CFR parts 576, 577, 578, 579, and subpart H of part 882); and

(xi) The Community Development Block Grant Programs—Entitlement, Small Cities, States and Special Purpose (Secs. 106 and 107 of the Housing and Community Development Act of 1974, Sec. 905 of the Act; see 24 CFR part 570).

(3) *Programs not covered.* Public Housing and Indian Housing funding (authorized under Title I and II of the United States Housing Act of 1937) is not dependent on the existence of, or a certification of compliance with, an approved housing strategy for the jurisdiction. Section 8 funding is not dependent on the existence of, or certification of compliance with, an approved housing strategy, except for the Section 8 Moderate Rehabilitation Single Room Occupancy Program (authorized under Section 441 of the McKinney Act). However, HUD funding allocations for the Section 8 Certificate and Voucher Programs are to be made in a way that enables participating jurisdictions to carry out their housing strategies (Sec. 556 of the Act). In addition, one basis for approval of rents for the Section 8 Programs that are higher than 110 percent of the fair market rents for the area based on special local conditions is a HUD determination that implementation of the approved housing strategy for the area requires the higher rents (Sec. 543(b) of the Act).

§ 91.5 Definitions.

Act. The Cranston-Gonzalez National Affordable Housing Act (Pub. L. 101–625, 104 Stat. 4079).

Annual update. A submission by a jurisdiction to HUD in a year in which a complete submission is not required (in accordance with § 91.55(b)), which provides new information for the next year about all the elements required by § 91.15 or § 91.20, as appropriate, including new certifications about fair housing enforcement and relocation assistance (see §§ 91.15(m) and 91.20(m)).

Certification. A written assertion, based on supporting evidence which must be kept available for inspection by HUD, by the Inspector General of HUD, and by the public. The assertion shall be deemed to be accurate unless HUD determines otherwise, after inspecting the evidence and providing due notice and opportunity for comment.

Complete submission. A strategy that fulfills the requirements of § 91.15 or § 91.20, as appropriate, with respect to the entire five year period to follow.

Cost burden. The extent to which gross housing costs, including utility costs, exceed 30 percent of gross income, based on data published by the U.S. Census Bureau.

Disabled family. A household composed of one or more persons at least one of whom is an adult (a person of at least 18 years of age) who has a disability. A person shall be considered to have a disability if the person is determined to have a physical, mental or emotional impairment that: (1) Is expected to be of long-continued and indefinite duration,

(2) Substantially impedes his or her ability to live independently, and

(3) Is of such a nature that the ability could be improved by more suitable housing conditions.

A person shall also be considered to have a disability if he or she has a

developmental disability as defined in Section 102(7) of the Developmental Disabilities Assistance and Bill of Rights Act (42 U.S.C. 6001–6007). The term "disabled family" also includes the surviving member or members of any household described in the first sentence of this paragraph who were living in an assisted unit with the deceased member of the household at the time of his or her death.

Elderly family. Family in which the head of the household or spouse is at least 62 years of age.

Family. A household comprised of one or more individuals.

Housing. Includes manufacured housing and manufactured housing lots.

Housing strategy (CHAS). A Comprehensive Housing Affordability Strategy prepared in accordance with this part, consisting of either a complete submission or an annual update.

HUD. The United States Department of Housing and Urban Development.

Jurisdiction. A State or unit of general local government.

Large families. Families of five or more persons.

Large family unit. Unit of at least three bedrooms.

Low-income families. Families whose incomes do not exceed 80 percent of the median income for the area, as determined by HUD with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 80 percent of the median for the area on the basis of HUD's findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.

Moderate-income families. Families whose incomes are between 80 percent and 95 percent of the median income for the area, as determined by HUD, with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 95 percent of the median for the area on the basis of HUD's findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.

Overcrowding. More than one person per room.

Participating jurisdiction. Any State or unit of general local government that has been so designated in accordance with the HOME Program (Title II of the Act).

Resubmission. A revised housing strategy submitted to HUD in respose to HUD's disapproval of a previous proposed housing strategy.

Severe cost burden. The extent to which gross housing costs, including utility costs, exceed 50 percent of gross income, based on data published by the U.S. Census Bureau.

State. Any State of the United States, the District of Columbia, and the Commonwealth of Puerto Rico.

Substantial amendment. A major change in a housing strategy submitted between scheduled annual submissions. It will usually involve a change to the goals or the plan, which may be occasioned by a decision to apply for assistance under a program not previously mentioned in the strategy.

Unit of general local government. A city, town, township, county, parish, village, or other general purpose political subdivision of a State; Guam, the Northern Mariana Islands, the Virgin Islands, American Samoa, Palau, or a general purpose political subdivision thereof; a consortium of such political subdivisions recognized by HUD in accordance with the HOME Program (Title II of the Act); and any agency or instrumentality thereof that is established pursuant to legislation and designated by the chief executive to act on behalf of the jurisdiction with regard to HUD assistance.

Very-low income families. Low-income families whose incomes do not exceed 50 percent of the median family income for the area, as determined by HUD, with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 50 percent of the median for the area on the basis of HUD's findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.

§ 91.10 Review by courts.

The adequacy of information contained in a housing strategy about a jurisdiction's public policies affecting the affordability of housing shall not be reviewable by any Federal, State, or other court. Review of a housing strategy by any Federal, State, or other court shall be limited to determining whether the process of development and the content of the strategy are in substantial compliance with the requirements of the statute. During the pendency of any action challenging the adequacy of a housing strategy or the action of HUD in approving a strategy, the court shall not have the authority to enjoin activities taken by the jurisdiction to implement an approved housing strategy. Any housing assisted during the pendency of such action shall not be subject to any order of the court resulting from such action.

Subpart B—Contents of Strategy

§ 91.15 Strategy for a unit of general local government.

The comprehensive housing affordability strategy must be submitted in a form that is approved by HUD, and it must contain the following information based on the most recent generally available data:

(a) *Needs data.* A description of the jurisdiction's current needs for housing assistance for very low-income, low-income, and moderate-income families and estimates of needs for the ensuing five-year period for residents and persons expected to reside in the jurisdiction because of employment there. The information: (1) Must include the most recent data published by the U.S. Census Bureau on the structural condition of housing, the extent of overcrowding and cost burden, including severe cost burden, and the extent to which families already receive housing assistance, ownership or rental status, racial and ethnic status, and family type, including elderly families, large families, and single persons; (2) must be presented separately for families requiring supportive services in connection with housing, including disabled families, families who are participating in an organized program to achieve economic independence and self-sufficiency, and persons with acquired immunodeficiency syndrome.

(b) *Homeless assistance needs and strategy.* A description of the nature and extent of homelessness within the jurisdiction, including the estimated number and special needs of homeless persons who are mentally ill, alcohol and drug abusers, runaway or abandoned youth, victims of domestic violence, and other categories that the jurisdiction may specify, with racial and ethnic status indicated, to the extent available. Information on these populations must be organized by whether the persons have a primary nighttime residence that is a shelter or that is a place not ordinarily designed for, or used as, a regular sleeping accommodation for human beings. The description must include a brief inventory of the facilities (including overnight sleeping capacity and occupancy) and services within the various geographic areas that address the needs of homeless persons. The description also must include the jurisdiction's strategy for providing:

(1) Emergency shelter and services,

(2) Housing and services for transition to permanent housing and independent living, and

(3) Housing and supportive services for those not capable of achieving independent living.

The strategy also must include a description of the characteristics and special needs of low-income families who are in imminent danger of becoming homeless and an action plan to help these families avoid emergency shelters.

(c) *Market characteristics.* A description of the significant characteristics of the jurisdiction's housing market, indicating how the current and anticipated conditions in the area will influence the use of funds made available for rental assistance, production of new units, rehabilitation of existing units, or acquisition of existing units. The information must include data on total population, household population, and total housing inventory, to provide context and to assure that trends are accurately represented. Data on the housing inventory must include the ownership or rental status of the units, whether they are occupied or vacant, their structural condition or habitability, their cost and size, and should indicate whether units are suitable for occupancy by elderly families, disabled families, families with children, and any other applicable categories of need identified elsewhere in the housing strategy statement, including any identified special housing needs. The inventory also must include an assessment of the extent of concentration of racial/ethnic minorities and of low-income families in the jurisdiction, along with the locations of these concentrations. Data must be presented separately regarding the use of all government assisted housing and homeless resources already available to address identified needs, such as public housing, Section 8 and Section 235/236 housing, homeless shelters and services, programs of the Farmers Home Administration, and any State or locally funded programs. For all types of assisted housing, information must be provided, to the extent practicable, on the number of units in the program, the number of habitable units, and the number of units occupied as of a recent date, and, with respect to rental housing, whether units are expected to be lost from the assisted housing inventory for any reason, including public housing demolition or conversion to homeownership, or prepayment or voluntary termination of a Federally assisted mortgage.

(d) *Relevant public policies.* An explanation of whether the cost of housing or the incentives to develop, maintain, or improve affordable housing in the jurisdiction are affected by State or local public policies, as embodied in statutes, ordinances, regulations, or administrative procedures and processes. Of particular concern are the policies of the jurisdiction, including tax policies affecting land and other property, land use controls, zoning ordinances, building codes, code enforcement, fees and charges, growth limits, and policies that affect the return on residential investment. The explanation must describe the jurisdiction's strategy to remove or ameliorate any negative effects of these policies, including any effects contributing to concentration of racial/ethnic minorities.

(e) *Institutional structure.* An explanation of the institutional structure, including private industry, nonprofit organizations, and public institutions, through which the jurisdiction will carry out its housing strategy. The explanation must assess the strengths and gaps in that delivery system and describe what the jurisdiction will do to overcome those gaps.

(f) *Resources.* An indication of how Federal funds expected to be made available to the jurisdiction in the next year will be used to leverage private and non-Federal public resources that are reasonably expected to be available. This shall include: (1) *Private resources.* A statement of resources from private sources, such as financial institutions, pension funds, foundations and non-profit organizations, that are reasonably expected to be made available to carry out the purposes of the Act, as stated in § 91.1, and the extent to which they will be used in connection with government funds; (2) *Government resources.* A statement identifying the resources reasonably expected to be made available to the jurisdiction from HUD, other Federal, or State and local governments for rental assistance, homeless assistance, production of new units, rehabilitation of existing units, acquisition of existing units, and any other assistance provided to carry out the purpose of the Act, as stated in § 91.1. These resources will include, where the jurisdiction deems it appropriate, the identification of any publicly owned land or property located in the jurisdiction that may be used to carry out the purposes of the Act.

(g) *Plan.* A statement setting forth the jurisdiction's plan for investment or other use of housing funds and other assistance anticipated under the Title II of the Act, the United States Housing Act of 1937, the Housing and Community Development Act of 1974, and the Stewart B. McKinney Homeless Assistance Act, and other programs covered under this part, during the next year, and over the next five-year period, indicating the general priorities for allocating investment geographically within the jurisdiction and among different activities and housing needs, including family type, income category, and nature of housing problem.

(h) *Intergovernmental cooperation.* A description of the means of cooperation and coordination between the unit of general local government and the State in the development, submission, and implementation of their housing strategies.

(i) *Public housing stock.* A description of the number of public housing units in the jurisdiction, their physical condition, and the restoration and revitalization needs of public housing projects within the jurisdiction. The strategy of the jurisdiction and the public housing agency for improving the management and operation of public housing projects and for improving the living environment of low- and very low-income families residing in public housing must be included.

(j) *Public housing homeownership.* A description of the jurisdiction's activities to encourage public housing residents to become more involved in management and to participate in homeownership.

(k) *Monitoring procedures.* A description of the standards and procedures the jurisdiction will use to monitor activities authorized under the Act and to ensure long-term compliance with the provisions of the Act.

(l) *Fair housing.* A certification that the jurisdiction will affirmatively further fair housing.

(m) *Replacement of low-income housing and relocation assistance.* A certification that the jurisdiction is in compliance with a residential antidisplacement and relocation assistance plan under section 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(d)), to the extent those requirements are applicable.

(n) *Goals.* A statement of the number of families that will be assisted using funds reasonably expected to be made available from HUD, either alone or in combination with other sources, as identified in accordance with paragraph (f) of this section. Of those families, a statement of the number of families for whom the jurisdiction will provide affordable housing, as defined in the HOME Program, in accordance with section 215 of the Act. Information must be displayed by family type, income

category, nature of housing problem, and need for supportive services.

§ 91.20 Strategy for a State.

In formulating its housing strategy for the State, the State government must include data covering all areas within the State, both metropolitan and non-metropolitan areas. A State may use a housing strategy prepared by a unit of general local government to cover that portion of the State's jurisdiction, by appending the local government's document to its own, but it is not required to do so. (See § 91.30 concerning coordination of State and local housing strategies.) The housing strategy submitted to HUD by the State must contain the elements that follow. Data on needs for housing assistance (paragraph (a) of this section), for homeless assistance (paragraph (b) of this section), and for market characteristics (paragraph (c) of this section), must be presented by different geographic areas within the State. The data may be presented by metropolitan area, county, unit of general local government, or some combination thereof, such as a recognized planning district. The comprehensive housing affordability strategy must be submitted in a form that is approved by HUD, and it must contain the following information based on the most recent generally available data:

(a) *Needs data.* A description of the jurisdiction's current needs for housing assistance for very low-income, low-income, and moderate-income families and estimates of needs for the ensuing five-year period for residents and persons expected to reside in the jurisdiction because of employment there, by metropolitan and non-metropolitan areas. The information: (1) Must include the most recent data published by the U.S. Census Bureau on the structural condition of housing, the extent of overcrowding and cost burden, including severe cost burden, and the extent to which families already receive housing assistance, ownership or rental status, racial and ethnic status, and family type, including elderly families, large families, and single persons; (2) must be presented separately for families requiring supportive services in connection with housing, including disabled families, families who are participating in an organized program to achieve economic independence and self-sufficiency, and persons with acquired immunodeficiency syndrome.

(b) *Homeless assistance needs and strategy.* A description of the nature and extent of homelessness within the State, including the estimated number and special needs of homeless persons who are mentally ill, alcohol and drug abusers, runaway or abandoned youth, victims of domestic violence, and other categories that the State may specify, with racial and ethnic status indicated, to the extent available. Information on these populations must be organized by whether the persons have a primary nighttime residence that is a shelter or that is a place not ordinarily designed for, or used as, a regular sleeping accommodation for human beings. The description must include a brief inventory of the facilities (including overnight sleeping capacity and occupancy) and services within the various geographic areas that address the needs of homeless persons. The description also must include the State's strategy for providing:

(1) Emergency shelter and services,

(2) Housing and services for transition to permanent housing and independent living, and

(3) Housing and supportive services for those not capable of achieving independent living.

The strategy also must include a description of the characteristics and special needs of low-income families who are in imminent danger of becoming homeless and an action plan to help these families avoid emergency shelters.

(c) *Market characteristics.* A description of the general characteristics that pertain throughout the State and, to the extent practicable, specific housing market conditions within individual housing market areas that differ from the general characteristics. This description must indicate how the current and anticipated conditions in the various areas will influence the use of funds made available for rental assistance, production of new units, rehabilitation of existing units, or acquisition of existing units. The information must include data on total population, household population, and total housing inventory, to provide context and to assure that trends are accurately represented. Data on the housing inventory must include the ownership or rental status of the units, whether they are occupied or vacant, their structural condition or habitability, their cost and size, and should indicate whether units are suitable for occupancy by elderly families, disabled families, families with children, and any other applicable categories of need identified elsewhere in the housing strategy statement, including any identified special housing needs. The inventory also must include an assessment of the extent of concentration of racial/ethnic minorities and of low-income families in the various geographic areas of the State along with the locations of these concentrations. Data must be presented separately regarding the use of all government assisted housing and homeless resources already available to address identified needs, such as public housing, Section 8 and Section 235/236 housing, homeless shelters and services, programs of the Farmers Home Administration, and any State or locally funded programs. For all types of assisted housing, information must be provided, to the extent practicable, on the number of units in the program, the number of habitable units, and the number of units occupied as of a recent date, and, with respect to rental housing, whether units are expected to be lost from the assisted housing inventory for any reason, including public housing demolition or conversion to homeownership, or prepayment or voluntary termination of a Federally assisted mortgage.

(d) *Relevant public policies.* An explanation of whether the cost of housing or the incentives to develop, maintain, or improve affordable housing in the geographic area of the State are affected by State as well as local public policies, as embodied in statutes, ordinances, regulations, or administrative procedures and processes. The State must consider the extent to which its policies are encouraging the removal of barriers to affordable housing. Of particular concern are policies such as tax policies affecting land and other property, land use controls, zoning ordinances, building codes, code enforcement, fees and charges, growth limits, and policies that affect the return on residential investment. The explanation must describe the State's strategy to remove directly or ameliorate any negative effects, as well as to work with the units of general local government involved to remove or ameliorate any negative effects, including effects of local policies contributing to concentration of racial/ethnic minorities. The strategy should consider direct State action, reform of State enabling legislation to remove or ameliorate any negative effects of local policies, encouragement of use of model codes and standards, and provision of technical assistance for local governments.

(e) *Institutional structure.* An explanation of the institutional structure, including private industry, public institutions, such as a State Housing Finance Agency, and non-profit organizations, such as a State-wide non profit organization, through which the State will carry out its housing strategy.

The explanation must assess the strengths and gaps [illegible] delivery system and describe what the State will do to overcome those gaps.

(f) *Resources.* An indication of how Federal funds expected to be made available to the State in the next year will be used to leverage private and non-Federal public resources. This shall include: (1) *Private resources.* A statement of resources from private sources, such as financial institutions, pension funds, foundations and non-profit organizations, that are reasonably expected to be made available to carry out the purposes of the Act, as stated in § 91.1, and the extent to which they will be used in connection with government funds; (2) *Government resources.* A statement identifying the resources reasonably expected to be made available from HUD, other Federal agencies or the State for rental assistance, homeless assistance, production of new units, rehabilitation of existing units, acquisition of existing units, and any other assistance provided to carry out the purposes of the Act, as stated in § 91.1. These resources will include, where the State deems it appropriate, the identification of any Federally or State-owned land or property located in the geographic area that may be used to carry out the purposes of the Act.

(g) *Plan.* A statement setting forth the State's plan for investment or other use of housing funds and other assistance anticipated under the title II of the Act, the United States Housing Act of 1937, the Housing and Community Development Act of 1974, the Stewart B. McKinney Homeless Assistance Act, and other programs covered under this part, during the next year, and over the next five-year period, indicating the general priorities for allocating investment geographically within the State and among different activities and housing needs, including family type, income category, and nature of housing problems. If the State plans to distribute its funds competitively, it should describe its priorities for distribution and its procedure. The plan must specifically provide for the distribution of assistance to non-metropolitan areas in amounts that take into account the non-metropolitan share of the State's total population.

(h) *Intergovernmental cooperation.* A description of the means of cooperation and coordination between the State and the unit of general local government, and between States if appropriate, in the development, submission, and implementation of their housing strategies.

(i) *Tax credits.* A description of the State's strategy to coordinate the Low-Income Tax Credit with development of housing for which rents are affordable to very low-income and low-income families, as determined in accordance with U.S. tax law.

(j) *Public housing ownership.* A description of the State's activities to encourage public housing residents to become more involved in management and to participate in homeownership.

(k) *Monitoring procedures.* A description of the standards and procedures the State will use to monitor activities authorized under the Act and to ensure long-term compliance with the provisions of the Act, whether administered directly by the State or through a unit of general local government.

(l) *Fair housing.* A certification that the State will affirmatively further fair housing. A similar certification must be required of any unit of general local government to which the State allocates HUD funds.

(m) *Replacement of low-income housing and relocation assistance.* A certification that the State is in compliance with a residential antidisplacement and relocation assistance plan under section 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(d)), to the extent those requirements are applicable. A similar certification must be required of any unit of general local government to which the State allocates HUD funds.

(n) *Goals.* A statement of the number of families that will be assisted using funds reasonably expected to be made available within the area from HUD, either alone or in combination with other sources, as identified in accordance with paragraph (f) of this section. Of those families, a statement of the number of families for whom the State will provide affordable housing, as defined in the HOME Program, in accordance with section 215 of the Act. Information must be displayed by family type, income category, nature of housing problem, and need for supportive services.

§ 91.25 Abbreviated strategy.

A jurisdiction that is not expected to be a participating jurisdiction may submit an abbreviated housing strategy that is appropriate to the types and amounts of assistance sought from HUD. The elements of strategies required under §§ 91.15 and 91.20 must be included except to the extent that they are clearly unnecessary or inapplicable, as determined by HUD. A jurisdiction entitled to receive funds under section 106(b) of the Housing and Community Development Act of 1974 that is not expected to be a participating jurisdiction must submit a strategy containing all of the elements required under § 91.15.

Subpart C—Coordination and Consultation

§ 91.30 Coordination of State and local housing strategies.

States and units of general local government that are participating jurisdictions must establish a method of coordinating the development and implementation of their housing strategies. States are encouraged to take a leadership role in convening and coordinating meetings to coordinate efforts to increase the availability of affordable housing. A State may adopt the housing strategy of a unit of general local government as its own for that geographic area of the State, provided that this procedure does not delay the State's submission. A unit of general local government need not seek approval of any elements of its housing strategy by the State government, nor may the State require such approval for purposes of this part.

§ 91.35 Consultation with social service agencies.

In the preparation of its housing strategy, a jurisdiction must make reasonable efforts to confer with appropriate social service agencies regarding the housing needs of children, elderly persons, persons with disabilities, homeless persons, and other persons served by the agencies.

Subpart D—Citizen Participation

§ 91.40 Preparation of housing strategy.

Before submitting a housing strategy under this part, a jurisdiction must:—

(a) Make available to its citizens, public agencies, and other interested parties information concerning the amount of assistance the jurisdiction expects to receive and the range of investment or other uses of the assistance that the jurisdiction may undertake.

(b) Make the proposed housing strategy for the jurisdiction available to the public by publishing a summary of the strategy in an appropriate number of newspapers of general circulation, and by offering copies of the entire strategy itself at an appropriate number of local libraries, local government offices and other appropriate public places. The length of time provided for affected citizens, public agencies, and other interested parties to examine its content

and to submit comments on the proposed housing strategy must be reasonable (at lease sixty days, except thirty days in the case of a strategy to be submitted before October 1991).

(c) Hold one or more public hearings to obtain the views of citizens, public agencies, and other interested parties on the housing needs of the jurisdiction. The hearings held on the housing strategy may be combined with other public hearings required in the CDBG programs, provided that the two subjects are treated separately. In the case of a State, there must be an appropriate number of hearings held in various parts of the State to effectively solicit comments from the public affected by the housing strategy.

(d) Provide citizens, public agencies, and other interested parties with reasonable access to records regarding any uses of any assistance the jurisdiction may have received during the preceding five years.

(e) Consider any comments or views of citizens. A summary of these comments or views must be attached. The submitted housing strategy or substantial amendment must be made available to the public.

§ 91.45 Substantial amendment to housing strategy or submission of performance report.

Before submitting any performance report or substantial amendment to a housing strategy under this section, a participating jurisdiction must provide citizens with reasonable notice of, and opportunity to comment on, the performance report or substantial amendment, and it must consider any comments or views of citizens. When a substantial amendment to a housing strategy, or a performance report is submitted, it must include a summary of citizen views received. The amendment or report must be made available to the public.

§ 91.50 Resolution of citizen complaints.

A jurisdiction must establish appropriate and practicable procedures to handle complaints from citizens related to the housing strategy or performance reports. At a minimum, the jurisdiction must respond to every written citizen complaint, either orally or in writing, within an established period of time.

Subpart E—HUD Review and Approval

§ 91.55 Submission of housing strategy.

(a) *General.* A housing strategy (either a complete submission or an annual update) must be submitted annually. To assure eligibility for HUD competitive grant funding and favorable allocation of Section 8 Program funding, the housing strategy should be submitted by October 31 of each year. It will cover the period from October 1 of that year through September 30 of the following year, unless, because of submission late in a fiscal year, the HUD Field Office approves a longer period that ends on September 30. (During the period from March 6, 1991 until October 31, 1991, a jurisdiction may submit a housing strategy to HUD for approval that covers the period from the date of submission through September 30, 1992.) Before funding for any fiscal year can be approved under a program requiring certification of compliance with an approved housing strategy, the jurisdiction must have submitted a housing strategy that has been approved in accordance with § 91.60.

(b) *Type of submission.* The first time a housing strategy is submitted, it must be a complete submission (as defined in § 91.5). Thereafter, the annual submission may be an annual update, as defined in § 91.5, until five years after the previous complete submission. A complete submission may need to be made more frequently than every five years if a significant change has occurred in the locality's housing market, because of a natural disaster or other factors, or if more recent data or information become available that would have a significant impact on the housing needs assessment and the housing plan. However, if major new census data become available, a complete housing strategy must be submitted. Whenever a complete submission is made, the five-year cycle starts over again.

§ 91.60 Approval of a strategy.

(a) HUD will review the housing strategy upon receipt. Any housing strategy will be deemed to have been approved, unless HUD determines, within 60 days after receipt of the strategy, that:

(1) The strategy is inconsistent with the purposes of the Act; or

(2) The information submitted to satisfy the requirements of § 91.15 or § 91.20 is not substantially complete (including consistency with data requirements).

(b) HUD may not disapprove a housing strategy based on the jurisdiction's adoption or continuation of a public policy identified as affecting the availability of affordable housing (in accordance with § 91.15(d) or § 91.20(d)).

§ 91.65 Actions in case of disapproval of a strategy.

(a) If HUD disapproves a housing strategy, it will immediately notify the jurisdiction of the disapproval. Not later than 15 days after HUD's communication of the disapproval, the Department must inform the jurisdiction in writing of the following:

(1) The reasons for the disapproval;

(2) The actions that the jurisdiction could take to meet the criteria for approval; and

(3) The time within which amendments to, or the resubmission of, a strategy will be permitted under § 91.70.

(b) If HUD fails to inform the jurisdiction of the reasons for disapproval within the 15-day period, the housing strategy will be deemed to have been approved.

§ 91.70 Amendment and resubmission of a housing strategy.

HUD will permit amendments to, or resubmission of, any housing strategy that is disapproved, for a period of 45 days following the date of first disapproval. HUD will approve or disapprove a housing strategy within 30 days after receiving the amendments or resubmission.

Subpart F—Performance Reports and Reviews

§ 91.75 Performance reports.

(a) *General.* Each jurisdiction that has an approved housing strategy shall annually review and report, in a form prescribed by HUD, on the progress it has made in carrying out its housing strategy. This report must include an evaluation of the jurisdiction's progress in meeting its goal of serving the number of families described in accordance with § 91.15(n) or § 91.20(n). The report must provide information on the number and types of households served, including the number of very low-income, low-income, and moderate-income persons served and the racial and ethnic status of persons served that were assisted with funds made available.

(b) *Submission.* Reports must be submitted no later than October 31 of each year following the year of approval of the first housing strategy, covering the period of October 1 through September 30 of the year just ended.

(c) *Failure to report.* If a jurisdiction fails to submit a report satisfactory to HUD in a timely manner, HUD may take one of the following actions with respect to assistance to the jurisdiction under title II of this Act, the Housing and Community Development Act of 1974, or

the Stewart B. McKinney Homeless Assistance Act:

(1) Suspend assistance until a satisfactory report is submitted to HUD; or

(2) Withdraw and reallocate the assistance if HUD finds, after notice and opportunity for a hearing, that the jurisdiction will not submit a satisfactory report. The hearing must be presided over by an administrative law judge appointed under 5 U.S.C. 3105 or detailed to HUD pursuant to 5 U.S.C. 3344. Hearings will be governed by the procedures set forth at 24 CFR part 30, subpart D.

§ 91.80 HUD performance reviews.

(a) *General.* HUD must review the activities of each jurisdiction that has an approved housing strategy at least annually to assure that the purposes of the Act, as described in § 91.1, are being carried out. The review must include, insofar as practicable, on-site visits by HUD and must include an assessment of the jurisdiction's—

(1) Management of funds made available under programs administered by HUD;

(2) Compliance with its housing strategy;

(3) Accuracy in the preparation of performance reports under § 91.80; and

(4) Efforts to ensure that housing assisted under programs administered by HUD are in compliance with contractual agreements and the requirements of law.

(b) *Report by HUD.* HUD must report to the jurisdiction on its performance review in writing and give the jurisdiction not less than 30 days to review and comment on the report. After taking into consideration the comments of the jurisdiction, HUD may revise the report and must make the jurisdiction's comments and the report, with any revisions, readily available to the public within 30 days after receipt of the jurisdiction's comments.

Subpart G—Miscellaneous

§ 91.99 Waiver authority.

(a) *Basic provision.* Upon determination of good cause, the Secretary of Housing and Urban Development may, subject to statutory limitations, waive any provision of this part. Each such waiver must be in writing and must be supported by documentation of the pertinent facts and grounds.

(b) *Reservation of authority by the Secretary.* The authority under paragraph (a) is reserved to the Secretary.

Dated: January 14, 1991.

Jack Kemp,

Secretary.

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ADDENDUM 8

RESUMEN EJECUTIVO

La ley national de Vivienda a su Alcance de 1990 (NAHA) se ha elogiado por sus partidarios. Esto demuestra que el Gobierno Federal nuevamente está dispuesto a tomar la delantera en proveer vivienda a costo razonable. Aunque el Gobierno Federal hace un papel impactante en asuntos de vivienda a su alcance por medio de NAHA, a la vez reconoce que los gobiernos estatales, y locales, igual que las agrupaciones no lucrativas y la industria privada toman un papel paulatinamente más importante en proveer vivienda a su alcance. La nueva realidad es que el Gobierno Federal toma pasos para permitir un uso más flexible de fondos para vivienda al cumplirse el requisito que fondos federales deben ser comprometidos a su medida por fondos locales. NAHA busca coordinar los muchos proveedores de vivienda con los multiples recursos disponibles para su utilzatión y la formación de Comprehensive Housing Affording Strategy (CHAS).

CHAS se compone de cinco secciones que representan esfuerzos para crear un plan para averiguar las necesidades de Vivienda a su Alcance desde el 1 de octubre de 1991 hasta el 30 de septiembre de 1996. CHAS empieza por documentar las necesidades de vivienda local y termina su labor describiendo el plan de ejecución de la región local para el año próximo. CHAS y el Gobierno Federal categorizan como hogares con muy bajo ingreso a aquellos en los cuales el ingreso no excede el 50% del ingreso medio en la región. Como hogares de bajo ingreso se categorizan a aquellos en los cuales el ingreso no excede el 80% del ingreso medio en la región, y se clasifican como hogares con ingreso decoroso a los cuales perciben desde el 81% al 95% del ingreso medio en la región. Sigue un síntesis de cada sección de CHAS:

Análisis de Necesidades

Casi 61,000 de los 100,000 hogares de arrendatarios en San Diego necesitan subsidios para poder pagar una renta a su alcance (que suma al 30% del ingreso mensual al hogar). Añadiendo todavía otros 5,000 - 7,000 desamparados (muchos son trabajadores agrícolas y jornaleros) y propietarios de casas que perciben ingresos bajísimos que casi no pueden con los costos altos de mantenimiento resulta en más de 75,000 san dieguinos de bajos ingresos que necesitan ayuda para poder gozar de vivienda a su alcance. De este total, más de 35,000 hogares de bajos ingresos destinan más del 50% de su ingreso mensual para cumplir con los gastos de vivienda. La necesidad del momento por vivienda a su alcance es dramático, pero esa necesidad se magnifica más cuando se toma en cuenta que 17,520 viviendas para personas de bajos ingresos deben aparecer en el mercado durante los próximos cinco años solo para poder dar abasto con la demanda local para vivienda.

Tomando en cuenta el gran número de familias de bajos ingresos y los altos costos locales para vivienda, se aprecia un cuadro de

dura pena. En algunos, la severidad se aumenta por las necesidades especiales de grupos, por ejemplo, el enfermo mental, los que padecen del SIDA, y la victima de violencia doméstica. Tal como otros municipios, San Diego ha dependido bastante de ayuda federal para proveer de vivienda a su alcance a familias de bajísimos ingresos. La ayuda federal se ha canalizado por el municipio y su Oficina de Vivienda, o en otros casos, por medio de lazos directos del Gobierno Federal con urbanizadoras. Se estima que 3600 viviendas a su alcance de propietarios particulares sean borrados de la existencia de viviendas a su alcance debido a que los propietarios han liquidado por adelantado sus hipotecas subsidiadas por el Gobierno Federal. Esta pérdida potencial podría afectar de una manera severa los esfuerzos del Municipio para proveer más viviendas a su alcance a familias de bajos ingresos.

El Mercado y Números Relativos

El censo de 1990 indica que hay mas de 1,110,000 habitantes san dieguinos (dentro de la ciudad). Casi 60% de los habitantes son blancos, 20.6% son hispanos, 11% son asiaticos y originarios del Océano Pacifico, 9% son negros, y .4% son indios americanos. En los últimos años, San Diego se ha clasificado como una de las ciudades con menos viviendas a su alcance. Esta anomalía afecta a todos los habitantes.

La mayor parte de las viviendas en San Diego están en condiciones buenas. De todos modos, casi 25,000 casas requieren restauración. Sucede con frecuencia que familias de bajos ingresos viven en viviendas de condiciones inferiores porque les es imposible pagar más renta para un vivienda decorosa. Aunque 25,000 viviendas no se aprecia como un número grande para una ciudad como San Diego, pero hay que ver el asunto desde la perspectiva de que tomaría 30 años para restaurar ese número de viviendas al paso normal del programa público para restaurar viviendas.

Estrategias

La ciudad de San Diego continuará empleando un sistema de servicio múltiple para proveer vivienda a su alcance a la población de San Diego. Una sociedad compuesta del sector público, el sector privado, y las agrupaciones no lucrativas emplearán una combinación de recursos para financiar nueva construcción, adquisición, y restauración de viviendas a su alcance para familias de bajos ingresos, igual que Ayuda con el Pago de la Renta y servicios de apoyo. Este enfoque al problema asienta bien en San Diego que ya cuenta con una existencia de viviendas en buena condición, pero todavía hay buena oportunidad para restaurar. También se planea la construcción de viviendas para necesidades a futuro.

La ciudad reconoce que hay limitaciones de recursos disponibles y de capacidad de construcción para afrontar su Programa de Vivienda a su Alcance. Es sabido que no se pueden satisfacer de inmediato todas las necesidades de vivienda a su alcance, por lo tanto, es requerido fijar como se distribuirán los recursos. De primera

priodidad es de proveer viviendas adicionales, y mantener oportunidades para vivienda a su alcance a residentes de muy bajos ingresos por medio de nueva construcción, adquisición, y restauración de viviendas y la continuidad de Ayuda con la Renta. Prioridades de segundo y tercer nivel incluye el proveer de: servicios a los desamparados, restaurción de vivienda, ayuda en asuntos de vivienda a familias de bajos ingresos, y el Programa de Ayuda para los Propietarios de Vivienda.

El Gobierno Municipal se afronta a la realidad de que cierta política regional entorpece los esfuerzos de proveer Vivienda a su Alcance para sus residentes. Por lo tanto, además de ampliar las oportunidades en la vivienda con el buen manejo de fondos públicos, el gobierno local tramitará cambios para aumentar la construcción de viviendas a su alcance.

Recursos

CHAS mantiene información que alista todos los recursos de indole Federal, Estatal, y Regional y tipos de fondos disponibles para apoyar Vivienda a su Alcance durante el período de 1 de octubre de 1991 hasta 30 de septiembre de 1992. Además, se guarda la distribución de fondos disponibles entre las siguientes tareas: restauración, adquisición, ayuda para inquilinos, construcción nueva, ayuda con la compra de vivienda, fondos para planeación, servicios de apoyo, y gastos de administración. El plan de Vivienda a su Alcance patrocinado por la ciudad de San Diego opera con una fuerte inversión en restauración, adquisición, construcción nueva, y ayuda para la compra de vivienda, y a la vez con una inversión menor en ayuda adicional para el inquilino, servicios de apoyo, y fondos para planeación. Se estima que un total de $85 millones se invertirán en el Programa de Vivienda a su Alcance durante el año fiscal de 1992. Cuando se reciba apoyo adicional para continuar la ayuda actual, se efectuará una inversión superior a $100,000,000 para proveer vivienda decorosa y a su alcance para los residentes de San Diego. Claro está que una inversión de esta magnitud resultará en más oportunidades de vivienda a su alcance, y a la vez, repercute a beneficio total de la economía local.

Ejecución

La prioridad del Programa de Ayuda con la Vivienda patrocinado por el Gobierno Municipal en su Plan de Cinco Años es de ofrecer vivienda a su alcance a residentes de muy bajos ingresos por medio de construcción nueva, adquisición, y restauración de viviendas, y el ofrecimiento de ayuda con la renta. De las 5,000 familias adicionales que recibirán ayuda con la renta durante el año fiscal de 1992, más de 4,000 familias se clasifican de muy bajos ingresos. La mayoría de la ayuda se ofrecerá a inquilinos (quienes también recibirán otros servicios relacionados de apoyo), con un porcentaje menor destinado para propietarios y compradores por primera vez de vivienda. Aunque muchos propietarios en esta clasificación reciben ayuda sin ser fondos de HUD, la ayuda tiene enfoque en climatizar

la vivienda a muy bajo costo. Entre aquellos que se clasifican de muy bajos ingresos se les auxiliará con la compra de vivienda a un número limitado de propietarios de casa móvil que buscan comprar su parque de casa móvil. Anótese, que de los 5,000 hogares que se espera ayudar en el año fiscal 1992, aproximadamente 1,300 hogares recibirán beneficios bajo los programas de climatización.

El gobierno local seguirá el plan de que agrupaciones no lucrativas ofrezcan la mayoría de ayuda para los desamparados (individuos y familias) por medio de albergues de emergencia, camas adicionales de emergencia durante clima inhóspito, y a la vez vivienda provisional y servicios relacionados de apoyo. El gobierno local estima que durante el año fiscal de 1992 la mayoría de los servicios para los desamparados estarán disponibles en el centro de la ciudad.

Ayuda con vivienda y apoyo relacionado se ofrecerá durante el año a personas con SIDA, a aquellos que requieren vivienda mas amplia, a los desamparados, a los trabajadores agrícolas, a las mujeres hostigadas, a los enfermos mental, y a los jovenes desamparados. Hasta que limite se les podrá auxiliar a estos grupos depende de la disponibilidad del apoyo federal y estatal para estas tareas.

Todos los programas de vivienda patrocinados con fondos federales estarán sujetos a verificación en forma metódica para asegurar cumplimiento con los requisitos de elegibilidad y costo al alcance de personas de bajos ingresos. Además se aportará documentación de que el Municipio cumple con los reglamentos de vivienda equitativa y reacomodo.

CORRECTED COPY

ADDENDUM 9

(R-92-518 REV.1)

RESOLUTION NUMBER R-279138

ADOPTED ON DEC 09 1991

WHEREAS, The National Affordable Housing Act of 1990 requires that participating jurisdictions utilizing federal housing monies create a Comprehensive Housing Affordability Strategy (CHAS) to address affordable housing needs over a five-year period; and

WHEREAS, the City of San Diego is such a participating jurisdiction; and

WHEREAS, the City of San Diego's CHAS will need approval by the U.S. Department of Housing and Urban Development (HUD) in order for the City to remain eligible to receive certain federal housing funds; NOW, THEREFORE,

BE IT RESOLVED, by the Council of The City of San Diego, as follows:

1. That the Comprehensive Housing Affordability Strategy covering the period of October 1, 1991, to September 30, 1996, on file in the office of the City Clerk as Document No. RR-279138 is hereby approved.

2. That the Executive Director of the Housing Commission is authorized to submit the City of San Diego's CHAS to HUD on behalf of the City.

3. That City staff and affiliated agencies are directed to pursue activities contained therein, as coordinated by the

Housing Commission, including those which require presentation of policy recommendations to the City Council for consideration.

APPROVED: JOHN W. WITT, City Attorney

By _____
Harold O. Valderhaug
Deputy City Attorney

HOV:ps
10/01/91
12/12/91 REV.1
Or.Dept:Hsg.Comm.
R-92-518

ADDENDUM 10

METHODOLOGY FOR COMPONENTS 1 AND 2 OF CITY OF SAN DIEGO CHAS

AUGUST 1991

Prepared by the San Diego Association of Governments

San Diego
ASSOCIATION OF GOVERNMENTS

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MEMBER AGENCIES: Cities of Carlsbad, Chula Vista, Coronado, Del Mar, El Cajon, Encinitas, Escondido, Imperial Beach, La Mesa, Lemon Grove, National City, Oceanside, Poway, San Diego, San Marcos, Santee, Solana Beach, Vista, and County of San Diego
ADVISORY/LIAISON MEMBERS: California Department of Transportation, U.S. Department of Defense, and Tijuana/Baja California Norte

TABLE 1A

OCCUPIED HOUSING UNITS
PRORATED TO OCTOBER 1, 1991

Sources: 1991 DOF Estimates, 1990 SourcePoint Income Estimates, 1990 Census, 1987 American Housing Survey (pp. 40, 54, 76 and 90)

- 411,058 total occupied units (1/1/91 DOF) - 406,096 total occupied units (1990 Census) = 4,962 units

- 4,962/9 months (4/90-1/91) = 551 units/mo.

- 551 x 18 months (4/90-10/91) = 9,918 units (2.4% growth)
  (Assumes same rate of growth for 9-month period 1/91-10/91)

- 406,096 units + 9,918 units = 416,014 total occupied housing units as of October 1, 1991.

- City of San Diego's 1990 Census owner/renter ratio applied to 9,918 =

  Owner: .48 (9,918) = 4,761
  Renter: .52 (9,918) = 5,157

Therefore,

Owner: 4,761 + 196,153 (4/90) = 200,914 Total **Owner** Occupied Units as of October 1, 1991.

Renter: 5,157 + 209,943 (4/90) = 215,100 Total **Renter** Occupied Units as of October 1, 1991.

DISTRIBUTION OF HOUSEHOLDS (HH) BY INCOME

$31,262 = 1990 Regional Median Income

50% x $31,262 = $15,631 (very low)
80% x $31,262 = $25,010 (other low)
95% x $31,262 = $29,699 (moderate)
120% x $31,262 = $37,514 (middle)

All Households = 417,641

A. Very Low Income (up to $15,631)

$$\frac{81{,}950 \textit{ Very Low HH}}{417{,}641 \textit{ All City HH}} = 19.6\%$$

- Regionally, the ratio of very low renter HH to very low owner HH is approximately 2:1. Therefore,

  Renter: .67 (.196) = 13.1%

  Owner: .33 (.196) = 6.5%

B. Other Low Income ($15,632 - $25,010)

$$\frac{74{,}595 \textit{ Other Low HH}}{417{,}641 \textit{ All City HH}} = 17.9\%$$

- Regionally, the ratio of other low renter HH to other low owner HH is approximately 1.7:1. Therefore,

  Renter: .63 (.179) = 11.3%

  Owner: .37 (.179) = 6.6%

C. Moderate Income ($25,011 - $29,699)

$$\frac{32{,}456 \textit{ Moderate HH}}{417{,}641 \textit{ All City HH}} = 7.7\%$$

- Regionally, the ratio of moderate renter HH to moderate owner HH is approximately 1.3:1. Therefore,

  Renter: .56 (.077) = 4.3%

  Owner: .44 (.077) = 3.4%

D. Middle Income ($29,700 - $37,514)

$$\frac{50{,}569 \textit{ Middle HH}}{417{,}641 \textit{ All City HH}} = 12.1\%$$

- Regionally, the ratio of middle renter HH to middle owner HH is approximately 1.1:1. Therefore,

  Renter: .48 (.121) = 5.8%

  Owner: .52 (.121) = 6.3%

E. Income Distribution by Tenure (Renter/Owner)

<u>Renters</u>

Very Low .131 x 417,641 (Total Occupied HH) = 54,711 (Line 1, Column E)

Other Low .113 x 417,641 (Total Occupied HH) = 47,193 (Line 7, Column E)

Moderate .043 x 417,641 (Total Occupied HH) = 17,959 (Line 14, Column E)

Middle .058 x 417,641 (Total Occupied HH) = 24,223 (Line 20,Column E)

<u>Owners</u>

Very Low .065 x 417,641 (Total Occupied HH) = 27,147 (Line 1, Column J)

Other Low .066 x 417,641 (Total Occupied HH) = 27,564 (Line 7, Column J)

Moderate .034 x 417,641 (Total Occupied HH) = 14,200 (Line 14, Column J)

Middle .063 x 417,641 (Total Occupied HH) = 26,311 (Line 20, Column J)

DISTRIBUTION OF HOUSEHOLDS (HH) BY HOUSEHOLD TYPE

A. Elderly (62+) Households

24% (1988 City of San Diego HAP, Line 14, Column H)

Renter: .24 x 215,100 (Total Renter HH) = 51,624 Total Elderly Renter HH

Owner: .24 x 200,914 (Total Owner HH) = 48,219 Total Elderly Owner HH

B. All Other Households*

1990 Census:

- 40,450 (Non-Family HH Aged 60+) - 33,187 (Non-Family HH Aged 65+) = 7,263 (Non-Family HH Aged 60-64)
- 7,263 x 40% (Regional % of persons 60-64 who are 60 or 61 years of age) = 2,905 (Non-Family HH Aged 62-65)
- 33,187 (Non-Family HH 65+) + 2,905 (Non-Family HH 62-65) = 36,092 (Non-Family HH Aged 62+)
- 156,498 (Total Non-Family HH) - 36,092 (Non-Family HH 62+) = 120,406 (Total Non-Family Non-Elderly HH)
- 120,406 x 1.2% growth (April 1, 1990 to October 1, 1991) = 1,445
- 120,406 + 1,445 = <u>121,851</u> Total All Other HH as of October 1, 1991.

---

*Non-Family Non-Elderly HH = All Other HH

- Renter/Owner Status

1) Renter: .52 (121,851) = 63,363 Total All Other Renter Households

   Owner: .48 (121,851) = 58,488 Total All Other Owner Households

2) Renter: 63,363 = 29.5% of Total Renter HH

   Owner: 58,488 = 29.1% of Total Owner HH

C. Small and Large Family Households

Renter: 215,100 (Total Renter HH)

- 51,624 (Total Renter Elderly HH)
- 63,636 (Total Renter All Other HH)

= 100,113 (Total Renter Small & Large Family HH)

[1988 City of San Diego HAP: Small family HH outnumber large family HH by a ratio of approximately 11:1]

∴ .917 x 100,113 (Total Renter Small & Large Family HH)

= 91,804 Total Renter Small Family HH

.083 x 100,113 (Total Renter Small & Large Family HH)

= 8,309 Total Renter Large Family HH

$$\frac{91{,}804 \text{ (Total Renter Small family HH)}}{215{,}100 \text{ (Total Renter HH)}} = 42.7\%$$

$$\frac{8{,}309 \text{ (Total Renter Large Family HH)}}{215{,}100 \text{ (Total Renter HH)}} = 3.8\%$$

Owner: 200,914 (Total Owner HH)

- 48,219 (Total Owner Elderly HH)
- 58,488 (Total Owner All Other HH)

= 94,207 (Total Owner Small & Large Family HH)

.917 (% Small Family) x 94,207 = 86,388 Total Owner Small Family HH

.083 (% Large Family) x 94,207 = 7,819 Total Owner Large Family HH

$$\frac{\text{86,388 (Total Owner Small Family HH)}}{\text{200,914 (Total Owner HH)}} = 43.0\%$$

$$\frac{\text{7,819 (Total Owner Large Family HH)}}{\text{200,914 (Total Owner HH)}} = 3.9\%$$

CONCLUSION*

24.0%	Elderly
42.9%	Small Family
3.8%	Large Family
29.3%	All Other
100.0%	All Households

* Assumes equal distribution between renter and owner households.

INCOME GROUPS BY HOUSEHOLD TYPE*

Renters:

Very Low (54,711 Total Very Low Renter HH)

54,711 x .24	=	13,130	Elderly HH (Line 1, Col A)
54,711 x .427	=	23,362	Small Family HH (Line 1, Col B)
54,711 x .038	=	2,079	Large Family HH (Line 1, Col C)
54,711 x .295	=	16,140	All Other HH (Line 1, Col D)

Other Low (47,193 Total Other Low Renter HH)

47,193 x .24	=	11,326	Elderly HH (Line 7, Col A)
47,193 x .427	=	20,151	Small Family HH (Line 7, Col B)
47,193 x .038	=	1,793	Large Family HH (Line 7, Col C)
47,193 x .295	=	13,923	All Other HH (Line 7, Col D)

Moderate (17,959 Total Moderate Renter HH)

17,959 x .24	=	4,310	Elderly HH (Line 14, Col A)
17,959 x .427	=	7,668	Small Family HH (Line 14, Col B)
17,959 x .038	=	682	Large Family HH (Line 14, Col C)
17,959 x .295	=	5,299	All Other HH (Line 14, Col D)

Middle (24,223 Total Middle Income Renter HH)

24,223 x .24	=	5,814	Elderly HH (Line 20, Col A)
24,223 x .427	=	10,343	Small Family HH (Line 20, Col B)
24,223 x .038	=	920	Large Family HH (Line 20, Col C)
24,223 x .295	=	7,146	All Other HH (Line 20, Col D)

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* Assumes equal distribution among income groups and by owner/renter status.

Owners:

Very Low (27,147 Total Very Low Owner HH)

27,147 x .24 = 6,515 Elderly HH (Line 1, Col F)

27,147 x .427 = 11,592 Small Family HH (Line 1, Col G)

27,147 x .038 = 1,032 Large Family HH (Line 1, Col H)

27,147 x .295 = 8,008 All Other HH (Line 1, Col I)

Other Low (27,564 Total Other Low Owner HH)

27,564 x .24 = 6,616 Elderly HH (Line 7, Col F)

27,564 x .427 = 11,770 Small Family HH (Line 7, Col G)

27,564 x .038 = 1,047 Large Family HH (Line 7, Col H)

27,564 x .295 = 8,131 All Other HH (Line 7, Col I)

Moderate (14,200 Total Moderate Owner HH)

14,200 x .24 = 3,408 Elderly HH (Line 14, Col F)

14,200 x .427 = 6,063 Small Family HH (Line 14, Col G)

14,200 x .038 = 540 Large Family HH (Line 14, Col H)

14,200 x .295 = 4,189 All Other HH (Line 14, Col I)

Middle (26,311 Total Middle Income Owner HH)

26,311 x .24 = 6,315 Elderly HH (Line 20, Col F)

26,311 x .427 = 11,235 Small Famil HH (Line 20, Col G)

26,311 x .038 = 999 Large Family HH (Line 20, Col H)

26,311 x .295 = 7,762 All Other HH (Line 20, Col I)

HOUSEHOLD CHARACTERISTICS

A. WITH HOUSING PROBLEMS*

1. Renters - Regionally, 4.2% of all renter occupied units have 'moderate' physical problems.

Very Low

Elderly (E):	.042 x 13,130	=	551	(Line 2, Col A)
Small Family (SF):	.042 x 23,362	=	981	(Line 2, Col B)
Large Family (LF):	.042 x 2,079	=	87	(Line 2, Col C)
All Other (AO):	.042 x 16,140	=	678	(Line 2, Col D)
Total:			2,297	(Line 2, Col E)

Other Low

E:	.042 x 11,326	=	476	(Line 8, Col A)
SF:	.042 x 20,151	=	846	(Line 8, Col B)
LF:	.042 x 1,793	=	75	(Line 8, Col C)
AO:	.042 x 13,923	=	585	(Line 8, Col D)
Total:			1,982	(Line 8, Col E)

Moderate

E:	.042 x 4,310	=	181	(Line 15, Col A)
SF:	.042 x 7,668	=	322	(Line 15, Col B)
LF:	.042 x 682	=	29	(Line 15, Col C)
AO:	.042 x 5,299	=	223	(Line 15, Col D)
Total:			755	(Line 15, Col E)

* Assumes equal distribution among income groups and between renters and owners.

2. Owners -- Regionally, 1.9% of all owner occupied units have "moderate" physical problems.

Very Low

E:	.019 x 6,515	=	124 (Line 2, Col F)
SF:	.019 x 11,592	=	220 (Line 2, Col G)
LF:	.019 x 1,032	=	20 (Line 2, Col H)
AO:	.019 x 8,008	=	152 (Line 2, Col I)
Total:			516 (Line 2, Col J)

Other Low

E:	.019 x 6,616	=	126 (Line 8, Col F)
SF:	.019 x 11,770	=	224 (Line 8, Col G)
LF:	.019 x 1,047	=	20 (Line 8, Col H)
AO:	.019 x 8,131	=	154 (Line 8, Col I)
Total:			524 (Line 8, Col J)

Moderate

E:	.019 x 3,408	=	65 (Line 15, Col F)
SF:	.019 x 6,063	=	115 (Line 15, Col G)
LF:	.019 x 540	=	10 (Line 15, Col H)
AO:	.019 x 4,189	=	80 (Line 15, Col I)
Total:			270 (Line 15, Col J)

B. PHYSICAL DEFECTS*

1. Renters - Regionally, 1.4% of all renter occupied units have "severe" physical problems.

Very Low

E:	.014 x 13,130	=	184 (Line 3, Col A)
SF:	.014 x 23,362	=	327 (Line 3, Col B)
LF:	.014 x 2,079	=	29 (Line 3, Col C)
AO:	.014 x 16,140	=	226 (Line 3, Col D)
Total:			766 (Line 3, Col E)

Other Low

E:	.014 x 11,326	=	159 (Line 9, Col A)
SF:	.014 x 20,151	=	282 (Line 9, Col B)
LF:	.014 x 1,793	=	25 (Line 9, Col C)
AO:	.014 x 13,923	=	195 (Line 9, Col D)
Total:			661 (Line 9, Col E)

Moderate

E:	.014 x 4,310	=	60 (Line 16, Col A)
SF:	.014 x 7,668	=	107 (Line 16, Col B)
LF:	.014 x 682	=	10 (Line 16, Col C)
AO:	.014 x 5,299	=	74 (Line 16, Col D)
Total:			251 (Line 16, Col E)

* Assumes equal distribution among income groups and between renters and owners.

2. Owners - Regionally, .2% of all owner occupied units have "severe" physical problems.

Very Low

E:	.002 x 6,515	=	13 (Line 3, Col F)
SF:	.002 x 11,592	=	23 (Line 3, Col G)
LF:	.002 x 1,032	=	2 (Line 3, Col H)
AO:	.002 x 8,008	=	16 (Line 3, Col I)
Total:			54 (Line 3, Col J)

Other Low

E:	.002 x 6,616	=	13 (Line 9, Col F)
SF:	.002 x 11,770	=	24 (Line 9, Col G)
LF:	.002 x 1,047	=	2 (Line 9, Col H)
AO:	.002 x 8,131	=	16 (Line 9, Col I)
Total:			55 (Line 9, Col J)

Moderate

E:	.002 x 3,408	=	7 (Line 16, Col F)
SF:	.002 x 6,063	=	12 (Line 16, Col G)
LF:	.002 x 540	=	1 (Line 16, Col H)
AO:	.002 x 4,189	=	8 (Line 16, Col I)
Total:			28 (Line 16, Col J)

C. OVERCROWDED*

Source: 1990 Census

1. Renters - 14.1% of all City of San Diego renter occupied units are overcrowded.

Very Low

E:	.141 x 13,130	=	1,851	(Line 4, Col A)
SF:	.141 x 23,362	=	3,341	(Line 4, Col B)
LF:	.141 x 2,079	=	297	(Line 4, Col C)
AO:	.141 x 16,140	=	2,308	(Line 4, Col D)
Total:			7,797	(Line 4, Col E)

Other Low

E:	.141 x 11,326	=	1,620	(Line 10, Col A)
SF:	.141 x 20,151	=	2,882	(Line 10, Col B)
LF:	.141 x 1,793	=	256	(Line 10, Col C)
AO:	.141 x 13,923	=	1,991	(Line 10, Col D)
Total			6,749	(Line 10, Cole E)

Moderate

E:	.141 x 4,310	=	616	(Line 17, Col A)
SF:	.141 x 7,668	=	1,097	(Line 17, Col B)
LF:	.141 x 682	=	98	(Line 17, Col C)
AO:	.141 x 5,299	=	758	(Line 17, Col D)
Total:			2,569	(Line 17, Col E)

* Assumes equal distribution among income groups.

2. Owners - 3.7% of all City of San Diego owner occupied units are overcrowded.

Very Low

E:	.037 x 6,515	=	241	(Line 4, Col F)
SF:	.037 x 11,592	=	429	(Line 4, Col G)
LF:	.037 x 1,032	=	38	(Line 4, Col H)
AO:	.037 x 8,008	=	296	(Line 4, Col I)
Total:			1,004	(Line 4, Col J)

Other Low

E:	.037 x 6,616	=	245	(Line 10, Col F)
SF:	.037 x 11,770	=	435	(Line 10, Col G)
LF:	.037 x 1,047	=	39	(Line 10, Col H)
AO:	.037 x 8,131	=	301	(Line 10, Col I)
Total:			1,020	(Line 10, Col J)

Moderate

E:	.037 x 3,408	=	126	(Line 17, Col F)
SF:	.037 x 6,063	=	224	(Line 17, Col G)
LF:	.037 x 540	=	20	(Line 17, Col H)
AO:	.037 x 4,189	=	155	(Line 17, Col I)
Total			525	(Line 17, Col J)

D. COST BURDEN > 30% *

1. Renters - Regionally, 72% of all elderly renter households are paying > 30% of income for housing. For non-elderly renter households, that figure is 56%.

Very Low

E:	.72 x 13,130	=	9,454	(Line 5, Col A)
SF:	.56 x 23,362	=	13,083	(Line 5, Col B)
LF:	.56 x 2,079	=	1,164	(Line 5, Col C)
AO:	.56 x 16,140	=	9,038	(Line 5, Col D)
Total:			32,739	(Line 5, Col E)

Other Low

E:	.72 x 11,326	=	8,155	(Line 11, Cole A)
SF:	.56 x 20,151	=	11,285	(Line 11, Cole B)
LF:	.56 x 1,793	=	1,004	(Line 11, Cole C)
AO:	.56 x 13,923	=	7,797	(Line 11, Cole D)
Total:			28,241	(Line 11, Col E)

Moderate

E:	.72 x 4,310	=	3,103	(Line 18, Col A)
SF:	.56 x 7,668	=	4,294	(Line 18, Col B)
LF:	.56 x 682	=	382	(Line 18, Col C)
AO:	.56 x 5,299	=	2,967	(Line 18, Col D)
Total:			10,746	(Line 18, Col E)

* Assumes equal distribution among income groups.

2. Owners - Regionally, 22% of all elderly owner households are paying > 30% of income for housing. For non-elderly owner households, that figure is 26%.

Very Low

E:	.22 x 6,515	=	1,433	(Line 5, Col F)
SF:	.26 x 11,592	=	3,014	(Line 5, Col G)
LF:	.26 x 1,032	=	268	(Line 5, Col H)
AO:	.26 x 8,008	=	2,082	(Line 5, Col I)
Total:			6,797	(Line 5, Col J)

Other Low

E:	.22 x 6,616	=	1,456	(Line 12, Col F)
SF:	.26 x 11,770	=	3,060	(Line 12, Col G)
LF:	.26 x 1,047	=	272	(Line 12, Col H)
AO:	.26 x 8,131	=	2,114	(Line 12, Col I)
Total:			6,902	(Line 12, Col J)

Moderate

E:	.22 x 3,408	=	750	(Line 18, Col F)
SF:	.26 x 6,063	=	1,576	(Line 18, Col G)
LF:	.26 x 540	=	140	(Line 18, Col H)
AO:	.26 x 4,189	=	1,089	(Line 18, Col I)
Total:			3,555	(Line 18, Col J)

E. SEVERE COST BURDEN > 50% *

1. Renters - Regionally, 43% of elderly renter households pay > 50% of their income for housing. For non-elderly renter households, that figure is 26%.

Very Low

E:	.43 x 13,130	=	5,646	(Line 6, Col A)
SF:	.26 x 23,362	=	6,074	(Line 6, Col B)
LF:	.26 x 2,079	=	541	(Line 6, Col C)
AO:	.26 x 16,140	=	4,196	(Line 6, Col D)
Total:			16,457	(Line 6, Col E)

Other Low

E:	.43 x 11,326	=	4,870	(Line 12, Col A)
SF:	.26 x 20,151	=	5,239	(Line 12, Col B)
LF:	.26 x 1,793	=	466	(Line 12, Col C)
AO:	.26 x 13,923	=	3,620	(Line 12, Col D)
Total:			14,195	(Line 12, Col E)

Moderate

E:	.43 x 4,310	=	1,853	(Line 19, Col A)
SF:	.26 x 7,668	=	1,994	(Line 19, Col B)
LF:	.26 x 682	=	177	(Line 19, Col C)
AO:	.26 x 5,299	=	1,378	(Line 19, Col D)
Total:			5,402	(Line 19, Col E)

* Assumes equal distribution among income groups.

2. Owners - Regionally, 7% of elderly owner households pay > 50% of their income for housing. For non-elderly, that figure is 6%.

Very Low

E:	.07 x 6,515	=	456	(Line 6, Col F)
SF:	.06 x 11,592	=	696	(Line 6, Col G)
LF:	.06 x 1,032	=	62	(Line 6, Col H)
AO:	.06 x 8,008	=	480	(Line 6, Col I)
Total:			1,694	(Line 6, Col J)

Other Low

E:	.07 x 6,616	=	463	(Line 12, Col F)
SF:	.06 x 11,770	=	706	(Line 12, Col G)
LF:	.06 x 1,047	=	63	(Line 12, Col H)
AO:	.06 x 8,131	=	488	(Line 12, Col I)
Total:			1,720	(Line 12, Col J)

Moderate

E:	.07 x 3,408	=	239	(Line 19, Col F)
SF:	.06 x 6,063	=	364	(Line 19, Col G)
LF:	.06 x 540	=	32	(Line 19, Col H)
AO:	.06 x 4,189	=	251	(Line 19, Col I)
Total:			886	(Line 19, Col J)

TABLE 1A RACIAL/ETHNIC GROUP HOUSEHOLDS

- According to the 1988 City of San Diego Housing Assistance Plan (HAP), an estimated 54% of all low income households are minority households.

  .54 x 156,615 (Total Low Income Renter HH)

  = 84, 572 Minority Low Income Renter HH

- According to the 1988 City of San Diego HAP, the low income minority population is 36% Black, 35% Asian, 3% Native American, and 26% Other. Hispanics, who can be of any race, constitute 38% of the total low income minority households.

Hispanic	.38 x 84,572 =	32,137 (Line 13, Col E)
Black	.36 x 84,572 =	30,446 (Line 13, Col E)
Asian/Other	.35 x 84,572 =	29,600 (Line 13, Col E)
Native American	.03 x 84,572 =	2,537 (Line 13, Col E)
Other	.26 x 84,572 =	21,989 (Line 13, Col E)

- Of the City of San Diego's 156,615 total low income renter households, 52% are very low income, 48% are other low income. Therefore,

Hispanic	.52 (32,137) =	16,711 (Line 1, Col E)
	.48 (32,137) =	15,426 (Line 7, Col E)
Black	.52 (30,446) =	15,832 (Line 1, Col E)
	.48 (30,446) =	14,614 (Line 7, Col E)
Asian/Other	.52 (29,600) =	15,392 (Line 1, Col E)
	.48 (29,600) =	14,208 (Line 7, Col E)
Native American	.52 (2,537) =	1,319 (Line 1, Col E)
	.48 (2,537) =	1,218 (Line 7, Col E)
Other	.52 (21,989) =	11,434 (Line 1, Col E)
	.48 (21,989) =	10,555 (Line 7, Col E)

- According to the 1988 City of San Diego HAP, minority households were characterized as 24% elderly, 68% small family, and 8% large family. Therefore,

Hispanic	Very Low:	.24 x 16,711	=	4,011 (Line 1, Col A)
		.68 x 16,711	=	11,363 (Line 1, Col B)
		.08 x 16,711	=	1,337 (Line 1, Col C)
	Other Low:	.24 x 15,426	=	3,702 (Line 7, Col A)
		.68 x 15,426	=	10,490 (Line 7, Col B)
		.08 x 15,426	=	1,234 (Line 7, Col C)
Black	Very Low:	.24 x 15,832	=	3,800 (Line 1, Col A)
		.68 x 15,832	=	10,765 (Line 1, Col B)
		.08 x 15,832	=	1,267 (Line 1, Col C)
	Other Low:	.24 x 14,614	=	3,507 (Line 7, Col A)
		.68 x 14,614	=	9,938 (Line 7, Col B)
		.08 x 14,614	=	1,169 (Line 7, Col C)
Asian/Other	Very Low:	.24 x 15,392	=	3,694 (Line 1, Col A)
		.68 x 15,392	=	10,467 (Line 1, Col B)
		.08 x 15,392	=	1,231 (Line 1, Col C)
	Other Low:	.24 x 14,208	=	3,410 (Line 7, Col A)
		.68 x 14,208	=	9,661 (Line 7, Col B)
		.08 x 14,208	=	1,137 (Line 7, Col C)
Native American	Very Low:	.24 x 1,319	=	317 (Line 1, Col A)
		.68 x 1,319	=	897 (Line 1, Col B)
		.08 x 1,319	=	105 (Line 1, Col C)
	Other Low:	.24 x 1,218	=	292 (Line 7, Col A)
		.68 x 1,218	=	828 (Line 7, Col B)
		.08 x 1,218	=	98 (Line 7, Col C)
Other	Very Low:	.24 x 11,434	=	2,744 (Line 1, Col A)
		.68 x 11,434	=	7,775 (Line 1, Col B)
		.08 x 11,434	=	915 (Line 1, Col C)
	Other Low:	.24 x 10,555	=	2,533 (Line 7, Col A)
		.68 x 10,555	=	7,178 (Line 7, Col B)
		.08 x 10,555	=	844 (Line 7, Col C)

TABLE 1B

Sources: Regional Task Force on the Homeless and 1990 Census.

Line 4 Figures for Line 4 were taken from the 1990 Census (STF1: P28).

Line 3 Figures for Line 3 were based on Regional Task Force on the Homeless estimates of 60% of all homeless being single adults and 5% of all homeless being youths on their own. The resulting figure was then multiplied by the Urban County sheltered and unsheltered percentages.

(A) .65 x 4,947 = 3,216
(B) 58% Sheltered (4,947 Total/2,846 Sheltered) x 3,216 = 1,865
(C) 42% Unsheltered (4,947 Total/2,101 Unsheltered) x 3,216 = 1,351

Line 2 Figures for Line 2 were based on Regional Task Force on the Homeless estimates of 35% of all homeless being members of a family. The resulting figure was then multiplied by the Urban County sheltered and unsheltered percentages.

(A) .35 x 4,947 = 1,731
(B) 58% Sheltered (4,947 Total/2,846 Sheltered) x 1,731 = 1,004
(C) 42% Unsheltered (4,947 Total/2,101 Unsheltered) x 1,731 = 727

Line 1 To obtain the number of homeless families, one would need to divide Number of Persons in Families (line 2) by the average homeless family size. However, the average homeless family size estimate is unavailable.

TABLE 1C

Data for this table is unavailable by crosstabulations requested.

TABLE 2A

Sources: 1980 Census and 1990 Census.

COLUMN A

Figures for Column A were taken from the 1980 Census (STF1). Line 6 includes the race category "Other".

COLUMN B

Figures for Column A were taken from the 1990 Census (STF1). Line 6 includes the race category "Other".

TABLE 2B (Prorated to October 1, 1991)

Sources: 1991 DOF Estimates, 1990 Census, 1988 City of San Diego Housing Assistance Plan (HAP), and 1987 American Housing Survey

COLUMN A: All Units

Line 1

- 436,872 (1/91 DOF) - 431,722 (90 Census) = 5,150 units

- 5,150/9 months (4/90-1/91) = 572 units/mo.

- 572 x 18 months (4/90-10/91) = 10,296 units (2.4% growth)
  (Assumes same rate of growth for 9 months period 1/91-10/91)
  ∴ 431,722 + 10,296 = 442,018 (Total Housing Units (10/91)

Line 2

416,014 Total Occupied Housing Units (see Table 1A Methodology)

Lines 3 and 6

Based on 1990 Census Renter/Owner ratio of 52/48, there are:

R: .52 (416,014 Total Occupied Units) = 216,327 Renter Occupied Units

O: .48 (416,014 Total Occupied Units) = 199,687 Owner Occupied Units

Line 9

442,084 (Total Year Round Units) - 416,014 (Total Occupied Units)
= 26,070 Total Vacant Units

Line 10

Based on 1990 Census, 54% of total City of San Diego vacant units were "For Rent".

.54 x 26,004 = 14,042 Total Vacant Units For Rent

Line 13

Based on 1990 Census, 16.2% of total City of San Diego vacant units were "For Sale".

.162 x 26,004 = 4,213 Total Vacant Units For Sale

Definitions:

1. Needing Rehab - Those units classified as "substandard units suitable for rehab" (1988 Urban County HAP).

2. Not Rehabbable - The difference between total substandard units and substandard units suitable for rehab (1988 Urban County HAP).

Lines 4 and 5

1) 17,089 Substandard Renter Occ. Units (1988 HAP) = 8% Substandard Rate
216,327 All Renter Occ. Units (1988 HAP)

.08 x 216,327 (Total Renter Occ. Units) =
17,306 Substandard Renter Occ. Units or Needing Rehab (Line 4).

2) 16,047 Substandard Suitable for Rehab Renter Occ. Units = 94% Substandard Suitable for Rehab Rate
17,089 Substandard Renter Occ. Units

.94 x 17,306 = 16,268 Substandard Suitable for Rehab Renter Occ. Units
∴ 17,306 - 16,268 = 1,038 Not Rehabbable Renter Occ. Units (Line 5)

Lines 7 and 8

1) 8,302 Substandard Owner Occ. Units (1988 HAP) = 4.4% Substandard Rate
188,674 All Owner Occ. Units (1988 HAP)

.044 x 199,687 (Total Owner Occ. Units)
= 8,786 Substandard Owner Occ. Units or Needing Rehab (Line 7)

2) 7,795 Substandard Suitable for Rehab Owner Occ. Units / 8,302 Substandard Owner Occ. Units = 94% Substandard Suitable for Rehab Rate

.94 x 8,786 = 8,259 Substandard Suitable for Rehab Owner Occ. Units
∴ 8,786 - 8,259 = 527 Not Rehabbable Owner Occ. Units (Line 8)

Lines 11 and 12

1) 987 Substandard Vacant Renter Units (1988 HAP) / 12,498 All Vacant Renter Units (1988 HAP) = 8% Substandard Rate

.08 x 14,042 (Total Vacant For Rent Units)
= 1,123 Substandard Vacant For Rent Units or Needing Rehab (Line 11)

2) 926 Substandard Suitable for Rehab Vacant For Rent Units / 987 Substandard Vacant For Rent Units = 94% Substandard Suitable for Rehab Rate

.94 x 1,123 = 1,056 Substandard Suitable for Rehab Vacant for Rent Units
∴ 1,123 - 1,056 = 67 Not Rehabbable Vacant for Rent Units (Line 12)

Lines 14 and 15

1) 324 Substandard Vacant Owner Units (1988 HAP) / 7,372 All Vacant Owner Units (1988 HAP) = 4.4% Substandard Rate

.044 x 4,213 (Total Vacant For Sale Units)
= 185 Substandard Vacant For Sale Units or Needing Rehab (Line 15)

2) 304 Substandard Suitable for Rehab Vacant For Sale Units / 324 Substandard Vacant For Sale Units = 94% Substandard Suitable for Rehab Rate

.94 x 186 = 175 Substandard Suitable for Rehab Vacant For Sale Units
∴ 186 - 175 = 11 Not Rehabbable Vacant For Sale Units (Line 15)

Lines 16 and 17

Per HUD's directions, these are to remain blank.

COLUMN B: 0-1 Bedroom (BD) Units

Line 1 169,000 (0-1 BD Total Units) = 18% (Region)
918,700 (Total Housing Units)

.18 Regional Percentage x 442,018 City of San Diego Total = 79,563

Line 2 145,100 (0-1 BD Occupied Units) = 17% (Region)
835,500 (Total Occupied Units)

.17 Regional Percentage x 416,014 City of San Diego Total = 70,722

Line 3 119,900 (0-1 BD Renter Occupied (RO) Units) = 32% (Region)
374,100 (Total RO Units)

.32 Regional Percentage x 216,327 City of San Diego Total = 69,225

Line 4 .08 Substandard (SS) x 69,225 = 5,538 needing rehab

Line 5 .94 Substandard Suitable for Rehab (SSR) x 5,538 = 5,206 therefore
5,538 - 5,206 = 332 not rehababble

Line 6 25,200 (0-1 BD Owner Occupied (OO) Units) = 5% (Region)
461,400 (Total OO Units)

.05 Regional Percentage x 199,687 City of San Diego Total = 9,984

Line 7 .044 (SS) x 9,984 =439 needing rehab

Line 8 .94 (SSR) x 439 = 413 therefore 439 - 413 = 26 not rehababble

Line 9 24,000 (0-1 BD Total Vacant Units) = 29% (Region)
83,200 (Total Vacant Units)

.29 Regional Percentage x 26,004 City of San Diego Total = 7,541

Line 10 $\frac{\text{13,100 (0-1 BD Vacant for Rent Units)}}{\text{37,100 (Total Vacant for Rent Units)}}$ = 35% (Region)

.35 Regional Percentage x 14,042 City of San Diego For Rent Total = 4,915

Line 11 .08 (SS) x 4,915 = 393 needing rehab

Line 12 .94 (SSR) x 393 = 369 therefore 393 - 369 = 24 not rehababble

Line 13 $\frac{\text{1,000(0-1 BD Vacant for Sale Units)}}{\text{10,700 (Total Vacant for Sale Units)}}$ = 9% (Region)

.09 Regional Percentage x 4,213 City of San Diego For Sale Total = 379

Line 14 .044 (SS) x 379 = 17 needing rehab

Line 15 .94 (SSR) x 17 = 16 therefore 17 - 16 = 1 not rehababble

COLUMN C: 2 Bedroom Units

Line 1 343,100 (Total 2 BD Units) / 918,700 (Total Housing Units) = 37% (Region)

.37 Regional Percentage x 442,018 City of San Diego Total = 163,547

Line 2 306,900 (2 BD Occupied Units) / 835,500 (Total Occupied Units) = 37% (Region)

.37 Regional Percentage x 416,014 City of San Diego Total = 153,925

Line 3 180,000 (2 BD RO Units) / 374,100 (Total RO Units) = 48% (Region)

.48 Regional Percentage x 216,327 City of San Diego Total = 103,837

Line 4 .08 (SS) x 103,837 = 8,307 needing rehab

Line 5 .94 (SSR) x 8,307 = 7,809 therefore 8,307 - 7,809 = 498 not rehababble

Line 6 126,900 (2 BD OO Units) / 461,400 (Total OO Units) = 28% (Region)

.28 Regional Percentage x 199,687 City of San Diego Total = 55,912

Line 7 .044 (SS) x 55,912 = 2,460 needing rehab

Line 8 .94 (SSR) x 2,460 = 2,312 therefore 2,460 - 2,312 = 148 not rehabbable

Line 9 36,200 (2 BD Total Vacant Units) / 83,200 (Total Vacant Units) = 44% (Region)

.44 Regional Percentage x 26,004 City of San Diego Total = 11,442

Line 10 $\frac{19,900 \text{ (2 BD Vacant for Rent Units)}}{37,100 \text{ (Total Vacant for Rent Units)}}$ = 54% (Region)

.54 Regional Percentage x 14,042 City of San Diego For Rent Total = 7,583

Line 11 .08 (SS) x 7,583 = 607 needing rehab

Line 12 .94 (SSR) x 607 = 571 therefore 607 - 571 = 36 not rehababble

Line 13 $\frac{3,300 \text{ (2 BD Vacant for Sale Units)}}{10,700 \text{ (Total Vacant for Sale Units)}}$ = 31% (Region)

.31 Regional Percentage x 4,213 City of San Diego For Sale Total = 1,306

Line 14 .044 (SS) x 1,306 = 57 needing rehab

Line 15 .94 (SSR) x 57 = 54 therefore 57 - 54 = 3 not rehababble

COLUMN D: 3+ Bedroom Units

Line 1 406,600 (Total 3+ BD Units) / 918,700 (Total Housing Units) = 45% (Region)

.45 Regional Percentage x 442,018 City of San Diego Total = 198,908

Line 2 383,600 (3+ BD Occupied Units) / 835,500 (Total Occupied Units) = 46% (Region)

.46 Regional Percentage x 416,014 City of San Diego Total = 191,367

Line 3 74,300 (3+ BD RO Units) / 374,100 (Total RO Units) = 20% (Region)

.20 Regional Percentage x 216,327 City of San Diego Total = 43,265

Line 4 .08 (SS) x 43,265 = 3,461 needing rehab

Line 5 .94 (SSR) x 3,461 = 3,253 therefore 3,461 - 3,253 = 208 not rehababble

Line 6 126,900 (3+ BD OO Units) / 461,400 (Total OO Units) = 67% (Region)

.67 Regional Percentage x 199,687 City of San Diego Total = 133,791

Line 7 .044 (SS) x 133,791 = 5,887 needing rehab

Line 8 .94 (SSR) x 5,887 = 5,534 therefore 5,887 - 5,534 = 353 not rehababble

Line 9 23,200 (3+ BD Total Vacant Units) / 83,200 (Total Vacant Units) = 27% (Region)

.27 Regional Percentage x 26,070 City of San Diego Total = 7,039

Line 10 $\frac{\text{4,000 (3+ BD Vacant for Rent Units)}}{\text{37,100 (Total Vacant for Rent Units)}}$ = 11% (Region)

.11 Regional Percentage x 14,042 City of San Diego For Rent Total = 1,544

Line 11 .08 (SS) x 1,544 = 123 needing rehab

Line 12 .94 (SSR) x 123 = 116 therefore 123 - 116 = 7 not rehababble

Line 13 $\frac{\text{6,400 (3+ BD Vacant for Sale Units)}}{\text{10,700 (Total Vacant for Sale Units)}}$ = 60% (Region)

.60 Regional Percentage x 4,213 City of San Diego For Sale Total = 2,528

Line 14 .044 (SS) x 2,528 = 111 needing rehab

Line 15 .94 (SSR) x 111 = 104 therefore 111 - 104 = 7 not rehababble

TABLE 2C

Source: 1990 SANDAG Regional Housing Needs Performance Report.

COLUMN A - This data was taken from the 1990 SANDAG Regional Housing Needs Performance Report and applies to federally assisted housing only.

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